DOE/RL-88-08 Revision 3B

300 Area Solvent Evaporator Closure Plan

Date Published September 1992

ATTACHMENT 16 TO THE DANGEROUS WASTE PORTION OF THE RESOURCE CONSERVATION AND RECOVERY ACT PERMIT FOR THE TREATMENT, STORAGE AND DISPOSAL OF DANGEROUS WASTE



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ENCLOSURE 3

----ENVIRONMENTAL CHECKLIST FORMS

REVISION 2

FOR

300 AREA SOLVENT EVAPORATOR

CLOSURE PLAN

REVISION 3

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SEPA ENVIRONMENTAL CHECKLIST (Rev. 2)

FOR

THE-300 AREA SOLVENT EVAPORATOR

CLOSURE PLAN (Rev. 3)

A. BACKGROUND

1. Name of proposed project, if applicable:

Closure of the 300 Area Solvent Evaporator (300 ASE) site.

Information contained in this checklist applies only to the 300 Area Solvent Evaporator site. Additional environmental information regarding the Hanford Site can be found in the environmental documents referenced in the answer to checklist question A.8.

2. Names of applicants:

U.S. Department of Energy-Richland Operations Office (DOE-RL) and Westinghouse Hanford Company (WHC)

3. Address and phone number of applicants and contact persons:

U.S. Department of Energy Richland Operations Office P.O. Box 550 Richland, Washington 99352 Westinghouse Hanford Company P.O. Box 1970 Richland, Washington 99352

Contact persons:

R. D. Izatt, Director
Environmental Restoration Division
----(509)-376-5441

R. E. Lerch, Manager Environmental Division ---(509) 376-5556

4. Date checklist prepared:

February 27, 1990

-44 -- 5. -- Agency requesting checklist:

State of Washington Department of Ecology Mail Stop PV-11 Olympia, Washington 98504-8711 Proposed timing or schedule (including phasing, if applicable):

Initial closure activities have been completed. All waste remaining in the 300 ASE was solidified and removed to a treatment, storage, and/or disposal (TSD) facility. The solvent evaporator tank was sectioned and also removed to a ISD facility. Upon approval of the 300 ASE Closure Plan, it is anticipated that final closure will be completed within 180 days.

Do you have any plans for future additions, expansions, or further activity related to or connected with this proposal? If yes, explain.

The closure activities that remain to be performed include soil and concrete sampling to verify absence of soil and concrete contamination originating from the 300 ASE. If clean closure is not practical, final disposition of the site will be determined through the Remedial Investigation and Feasibility Study (RI/FS) process in conjunction with the 300 Aggregate Area Operable Unit (300-FF-2).

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

This_revised_SEPA_Checklist-is-being submitted to the Washington State Department of Ecology (Ecology) concurrently with revision 3 of the Closure Plan for the 300 ASE. A Memorandum-to-Eile and an Environmental Evaluation similar to this SEPA Checklist may be prepared for DOE-RL and WHC internal documentation purposes. A RI/FS is planned for the 300-FF-2 Operable Unit.

Additional environmental information regarding the Hanford Site can be found in the following documents:

Final Environmental Impact Statement - Disposal of Hanford Defense High-Level, Transuranic and Tank Wastes, DOE/EIS-0113, Volumes 1 through 5, 1987, U. S. Department of Energy, Washington, D.C.

Draft Environmental Impact Statement - Decommissioning of Eight Surplus Reactors Production Reactors at the Hanford Site, Richland Washington, DOE/EIS-0119D, 1989, U. S. Department of Energy, Washington, D.C.

Hanford_Site_National Environmental Policy Act (NEPA) Characterization, C. E. Cushing, PNL-6415, Rev. 1, 1987, UC-11, Pacific Northwest Laboratory, Richland, Washington.

48 ____9__Do you know whether applications are pending for government approvals of other proposals directly affecting property covered by your proposal?

No.

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----10. List any government approvals or permits that will be needed for your proposal, if known.

Ecology is the lead agency authorized to approve the closure plan for the 300 ASE site under requirements authorized by the Resource Conservation and Recovery Act (RCRA), and Chapter 173-303-400 of the Washington Administrative Code. No other permits are known to be required at this time.

11. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

This project proposes a clean closure strategy for final closure of the 300 ASE. Clean closure is contingent on the verification that soil and concrete contamination originating from the 300 ASE is below ---established-clean-up-levels.--Soil and concrete samples will be collected and analyzed to assess contamination.

The solvent evaporator closure site is located in the northeast corner of the 300 Area of the Hanford Site. The evaporator operated as a treatment tank facility for solvent wastes from nearby reactor fuel manufacturing facilities from-1975 to 1985. All waste remaining in the 300 ASE was solidified and removed to a TSD facility. The solvent evaporator tank was sectioned and also removed to a TSD facility. The remaining closure site is a section of soil (approximately 500 square feet) and a portion of the 333 East Concrete Pad (approximately 2200 square feet) that encompassed the location of the 300 ASE during its 10-year operating period.

Underlying the 300 ASE site is an inactive low-level radioactive waste burial ground (618-1). This burial ground is one of a group of sites within the 300 Area collectively referred to as the 300 Operable Unit 300-FF-2. The 300 Aggregate Area Operable Units (including Operable Unit 300-FF-2) have been included on the National Priorities List (NPL) of federal facilities requiring remedial action and regulation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a - 46---- street address, if any, and section, township, and range, if known. a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, should submit any plans required by the agency, you are not required to 51 ---- duplicate maps or detailed plans submitted with any permit applications related to this checklist.

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 The facility is located in TION, R28E, Section II in the northeast corner of the 300 Area of the Hanford Site. Maps and detailed location plans are contained in the closure plan submitted with this checklist.

B. ENVIRONMENTAL ELEMENTS

- 1. Earth
- a. General description of the site: Flat, rolling, hilly, steep slopes, mountainous, other.

Flat.

- b. What is the steepest slope on the site (approximate percent slope)?

 The approximate slope of the land at the facility is less than two percent.
- c. What general types of soil are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

The soil found at the 300 ASE site is fill material consisting of a gravelly sand with cobbles. No farming is permitted on the site.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

No.

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate the source of the fill.

None at this time.

f. Could erosion occur as a result of clearing, construction, or use?

If so, describe.

Due to the flat topography, dry climate, and soil type present at the site, erosion is not expected.

g. About what percentage of the site will be covered with impervious surfaces after project construction (for example, asphalt or __buildings)?

None at this time.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

None at this time.

- 2. Air
- a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

Minor amounts of dust may be generated from the drill which is used for concrete sampling. Air misting will be used to control airborne discharges during concrete drilling.

b. Are there any offsite sources of emissions or odors that may affect your proposal? If so, generally describe.

No.

c. Proposed measures to reduce or control emissions or other impacts to the air, if any:

None at this time.

- 3. Water
- a. Surface
 - 1) Is there any surface water body in or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river items flows into.

No. The closest body of surface water is the Columbia River, which is approximately one-third of a mile from the 300 ASE.

 2) Will the project require any work over, in, or adjacent to (within 200 feet of) the described waters? If yes, please describe and attach available plans.

No.

-3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area that would be affected. Indicate the source of the fill.

None.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

No.

5) Does the proposal lie within a 100-year floodplain? If so, note . -- location on the site plan.

No.

6) Does the proposal involve any discharges of waste material to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No.

b. Ground

1) Will groundwater be withdrawn, or will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

No.

2) Describe waste materials that will be discharged into the ground from septic waste tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

Does not apply.

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| <u></u> | Water | Run-off (| (including | storm | water | ١. |
|---------|-------|-----------|-------------|----------|--------|-----|
| ζ. | March | Kun-off (| (including | 20001111 | water, | , . |

 Describe the source of run-off (including storm water) and methods of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other wastes? If so, describe.

Does not apply.

 Could waste materials enter ground or surface waters? If so, generally describe.

No.

d. Proposed measures to reduce or control surface, ground, and run-off water impacts, if any:

Does not apply.

- Plants
- a. Check the types of vegetation found on the site:
 - deciduous trees: alder, maple, aspen, other
 evergreen trees: fir, cedar, pine, other
 shrubs
 grass
 pasture
 crop or grain
 wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other
 water plants: water lily, eelgrass, milfoil, other
 other types of vegetation

 None.
- b. What kind and amount of vegetation will be removed or altered?
 None.
- c. List threatened or endangered species known to be on or near the

None on the 300 ASE site: However, additional information concerning endangered and threatened plants on the Hanford Site can be found in the environmental documents referenced in the answer to checklist question A8.

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be found in the environmental documents referenced in the answer to checklist question A8.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.

None.

- 5. Animals
- a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site:

birds: hawk, heron, eagle, songbirds, other

mammals: deer, bear, elk, beaver, other fish: bass, salmon, trout, herring, shellfish, other

Starlings, lagomorphs, and pigeons have been observed on the site. Additional information on birds and animals found on the Hanford Site can be found in the environmental documents referenced in the answer to checklist question A8.

b. List any threatened or endangered species known to be on or near the site.

The 300 ASE site is not known to be used by any threatened or endangered species. Additional information concerning endangered and threatened animals on the Hanford Site can be found in the environmental documents referenced in the answer to checklist question A8.

c. Is the site part of a migration-route? If so, explain.

No. the site is not used by animals for migration. However, the adjacent Columbia River is considered an important resting place for Pacific flyway waterfowl and shore birds during the autumn migration. Additional information on the Hanford Site environment can be found in the environmental documents referenced in the answer to checklist question A8.

y day Proposed measures to preserve or enhance wildlife, if any:
None.

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a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. None.

adjacent properties? If so, generally describe.

No.

plans of this proposal? List other proposed measures to reduce or

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce control energy impacts, if any:

Does not apply.

7. Environmental Health

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a. Are there any environmental health hazards, including exposure toxic chemicals, risk of fire and explosion, spill, or hazardou waste, that could occur as a result of this proposal? If so, a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

> Environmental health hazards are not expected. However, the potential for exposure to hazardous chemicals exists during the soil sampling effort. Procedures to prevent and manage hazards are presented in the closure plan.

1) Describe special emergency services that might be required.

In the event of an unexpected emergency, fire, ambulance, and patrol assistance may be required. These services are available on the Hanford Site.

-39 -----2)---Proposed measures to reduce or control environmental health hazards, if any:

> ----No environmental health hazards are expected. Procedures to prevent and manage potential hazards are presented in the closure plan.

b. Noise

project (for example: traffic, equipment, operation, other)?

None.

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2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

A minor short-term increase in noise, may result from the air drill which is used for concrete sampling.

- 3) Proposed measures to reduce or control noise impacts, if any: None.
- 8. Land and Shoreline Use
- a. What is the current use of the site and adjacent properties?

The 300 ASE site is part of the Hanford Site, which contains many facilities for waste management and special nuclear material production. When the evaporator was active (1975-1985), it provided treatment by evaporation for spent solvents generated at Hanford. All waste remaining at the site has been removed to a TSD facility. No waste management activity is currently ongoing on the 300 ASE site. Completely underlying the 300 ASE site is an ----inactive solid radioactive waste burial ground. The 618-1 Burial Ground was in service from 1945 to 1957 and contains uranium, plutonium, and fission products from the 300 Area fuel manufacturing facilities and incidental waste from 300 Area laboratories which were in operation at that time. Adjacent to the 300 ASE site _is_an_active_concrete pad for materials and eguipment storage.

b. Has the site been used for agriculture? If so, describe.

The 300 ASE site has not been used for agricultural purposes since 1943.

c. Describe any structures on the site.

Does not apply.

- d. Will any structures be demolished? If so, what? No.
- e. What is the current zoning classification of the site?

The 300 ASE site possesses the zoning classification of --- Unclassified Use by Benton County.

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9. Housing

Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

None.

f. What is the current comprehensive plan designation of the site?

The 1985 Benton County Comprehensive Land Use Plan designates the Hanford Site as the "Hanford Reservation". Under this designation, Tand on the Site may be used for "activities nuclear in nature". Non-nuclear activities are authorized "if and when DOE approval for such activities is obtained".

g. If applicable, what is the current master shoreline program designation of the site?

Does not apply.

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

No.

i. Approximately how many people would reside or work in the completed project?

None.

- j. Approximately how many people would the completed project displace? None.
- ------k: Proposed measures to avoid or reduce displacement impacts, if any: Does not apply.
 - 1. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

Does not apply.

 b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

None.

c. Proposed measures to reduce or control housing impacts, if any:

Does not apply.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

Does not apply.

b. What views in the immediate vicinity would be altered or obstructed?

None.

c. Proposed measures to reduce or control aesthetic impacts, if any:

ll. Light and Glare

a. What type of light or glare will the proposal produce? What time of the day would it mainly occur?

None.

b. Could light or glare from the finished project be a safety hazard ---- or interfere with views?

No.

:. What existing offsite sources of light and glare may affect your proposal?

None.

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d. Proposed measures to reduce or control light and glare impacts, if any:

Does not apply.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

None.

b. Would the proposed project displace any existing recreational uses? ——If—so, describe.

Does not apply.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

Does not apply.

13. Historic and Cultural Preservation

Are-there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site?—If-so, generally describe.

No part of the 300 ASE is listed on or proposed for inclusion on preservation registers. Additional information on the Hanford Site environment can be found in the environmental documents referenced in the answer to checklist question A8.

Generally describe any landmarks or evidence of historic,
 archaeological, scientific, or cultural importance known to be on
 or next to the site.

There are no known archaeological, historical, or native American religious sites at the facility. Additional information on the Hanford Site environment can be found in the environmental documents referenced in the answer to checklist question A8.

c. Proposed measures to reduce or control impacts, if any:
Does not apply.

14. Transportation

a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

Does not apply.

b. Is the site currently served by public transit? If not, what is the approximate distance to the nearest stop?

The site is not publicly accessible and, therefore, is not served by public transit.

c. How many parking spaces would the completed project have? How many would the project eliminate?

None.

d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

No.

e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

None.

g. Proposed measures to reduce or control transportation impacts, if any:

Does not apply.

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R. E. Lerch, Manager **Environmental Division**

b. Proposed measures to reduce or control direct impacts on public services, if any:

schools, other)? If so, generally describe.

Would the project result in an increased need for public services

(for example: fire protection, police protection, health care,

Does not apply.

16. Utilities

15. Public Services

No.

a. List utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.

None.

Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

None.

С. SIGNATURES

-The-above answers-are-true and complete to the best of our knowledge. We understand that the lead agency is relying on them to make its decision.

R. O. Izatt Director/

Environmental Restoration Division

U.S. Department of Energy Richland Operations Office

Westinghouse Hanford Company

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RECORD OF REVISION

(1) Document Number

DOE/RL 88-08

Page 1

(2) Title

300 Area Solvent Evaporator Closure Plan, Revision 3B

| - | CHANGE CONTROL RECORD | ···· | | | | |
|-------------|---|--|--|--|--|--|
| (3) | (4) Description of Change - Replace, Add, and Delete | Authorized for Release | | | | |
| Revision- | Pages | (5) Cog. Engr. (6) Cog. Mgr. Date | | | | |
| 3 | (7) Responds to Ecology's Notice of | S.B. Clifford F.A. Ruck 03/13/90 | | | | |
| . | Deficiency: January 2, 1990 | | | | | |
| | | Sand Cliffer IT Freshit | | | | |
| 3A | Responses (noted with change bars) to | S.B. Clifford F.A. Ruck 09/24/92 | | | | |
| | Ecology's Notice of Deficiency | S.B. Clifford F.A. Ruck 09/24/92 | | | | |
| | (11-09-90) and Notice of Deficiency | a in 1 Francis | | | | |
| | Response Acceptance (02-25-91) | Solleford Frank 114 | | | | |
| | page changes: Table of Contents, 1-1, 1-2, 1-22, 1-24, 1-25, 1-26, 1-27, 2-1, | Revision 3A totally replaces | | | | |
| | | Revision 4 dated 06/26/91 | | | | |
| | 3-2, 3-3, 3-4, 3-5, 3-6, 3-7, 3-8, 3-9, | (procedural change). | | | | |
| D74 | 3-11, 3-13, 4-1, 5-2, 6-4, 7-1, 8-1, 8-2, 8-3, 8-4, 8-5, 8-6, 9-2, 10-1, | Naka. Danishan daka akawa kha | | | | |
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                                        ACRONYMS
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 3
    300 ASE
                       300 Area Solvent Evaporator
    CERCLA
                       Comprehensive Environmental Response, Compensation, and

    Liability Act of 1980

                       Code of Federal Regulations
 7
    CFR
                       Contract Laboratory Program
    CLP
 9
10 DOE
                       U.S. Department of Energy
11
    DOE-RL
                       U.S. Department of Energy-Richland Operations Office
12
13
                       Washington State Department of Ecology
     Ecology
                       Westinghouse Hanford Company's
14
    EII
15
                       Environmental Investigation and Site
16

    Characterization Manual (WHC-CM-7-7)

                       U.S. Environmental Protection Agency
17
    EPA
18
19
    FR
                       Federal Register
20
21
                       Integrated Risk Information System
    IRIS
22
23
                       mean sea level
    msl
24
25
    OSHA
                       Occupational Safety and Health Administration
26
27
     PNL
                       Pacific Northwest Laboratory
28
    PUREX
                       Plutonium/Uranium Extraction (Plant)
29
.30 __QA/QC
                       Quality assurance/quality control
31
32
    RCRA
                       Resource Conservation and Recovery Act
33
34
    UNC
                       United Nuclear Industries
35
    WAC
36
                       Washington Administrative Code
37
    Westinghouse
                       Westinghouse Hanford Company (WHC)
38
     Hanford
39
40
41
                                      ABBREVIATIONS
42
43
    DCE
                       dichloroethylene
44
45.
    mg/kg
                       milligram per kilogram (1 millionth)
46
47
    PCE
                       perchloroethylene (tetrachloroethylene)
48
49
    ppm
                       parts per million (I millionth)
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51
    TCA
                       1,1.1-trichloroethane
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| 1 2 | | ABBREVIATIONS (cont) |
|-------------|------------|---|
| 3 4 5 | TCE | trichloroethylene |
| 5 6 7 | μg/g | micrograms per gram (1 millionth) |
| 8 | μ g/ml | microgram per milliliter (1 thousandth) |

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----1--0-- INTRODUCTION

This document describes activities for the closure of a dangerous waste treatment tank facility, owned and operated by the U.S. Department of Energy-Richland Operations Office (DOE-RL) and co-operated by the Westinghouse --- 7 Hanford Company (Westinghouse Hanford). Although the U.S. Government holds legal title to this facility, the DOE-RL, for the purposes of defining Resource Conservation and Recovery Act of 1976 (RCRA) (EPA 1982) facilities, is considered the legal owner of the facility under existing U.S. Environmental Protection Agency (EPA) interpretive regulations Solvent Evaporator (300 ASE), which was located in the 300 Area of the Hanf 14 Site from 1975 to 1986, and was managed for the DOE-RL by UNC Nuclear 15 Industries, Incorporated. The 300 ASE evaporator unit was a modified load 16 lugger (dumpster) in which solvent wastes were evaporated, and the adjacent 333 East Concrete Pad, where 55-gallon barrels of waste solvents were temporarily stored while awaiting liquid transfers into the evaporator.

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20 From the start of the Hanford Site in the early 1940's until just price to the use of the 300 Area Process Transfers (Management 1940). lugger (dumpster) in which solvent wastes were evaporated, and the adjacent

From the start of the Hanford Site in the early 1940's until just prior to the use of the 300 Area Process Trenches (March 1975), almost all the spent process chemicals from the 300 Area were discharged to the 300 Area Process Ponds. These ponds received degreaser solvents, waste acids, caustics, and machine sump oils. The only excluded discharges were acid solutions that 25 contained sufficient uranium for economically practical recovery. In 1975, when the 300 Area Process Trenches replaced the 300 Area process ponds, the 300 ASE was utilized so that volatile spent solvents would not be discharged to the 300 Area Process Trenches.

Starting in January or Februar of 1975, the used degreaser solvents were -----31 pumped into-steel-55-gallon barrels and stored on the 333 East-Concrete Pad until a disposal solution could be found. There was no satisfactory disposal or treatment facility for these degreaser solvents on the Hanford Site in 1975 until the 300 ASE was installed in the spring of 1976. The amount of ..35... degreaser..solvent..that evaporated in the 300 ASE (an average of 600 gallons per year) represents about 17 percent of the total degreaser solvent used. The other 83 percent of the degreaser solvent entered the 333 Building air from the operating degreasers, and was discharged to the atmosphere through doors, vents, and exhaust stacks.

41 No formal records management system nor records of operations/ maintenance, which would have met the requirements of WAC 173-303, were 43 maintained. However, old photographs of the 300 Area have been enlarged to reconstruct the 300 ASE locations.

Some of the 300 ASE solvents were radioactively contaminated because the solvents came from a degreaser, which processed bare uranium metal billets from the N Reactor Fuel Manufacturing facility. The typical 300 ASE waste was composed of perchloroethylene (PCE), trichloroethylene (TCE), 1,1,1-trichloroethane (TCA), ethyl acetate/bromine solution, paint shop solvents, and possibly used oil. Small amounts of uranium and alloys of

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copper, zirconium, and possibly zirconium/beryllium were also present in the degreaser solvents as particulates. Although some solvents were not radioactively contaminated (i.e., originating from the degreasing of nonradioactive-bearing materials), radioactive and non-radioactive solvents were intermixed via the storage barrels, and thus, the entire mixture was regarded as radioactive waste.

_____In 1985, the 300 ASE was phased out and waste solvents were handled in accordance with the DOE-RL radioactive waste procedures. Shutdown of the 300 ASE began in November 1985 with the solidification of the remaining spent solvents and proceeded in accordance with UNC Nuclear Industries' procedures (see Appendix D). By the spring of 1986, the evaporator sludges had been removed and the steel surfaces thoroughly washed, and cut into pieces for burial box disposal. Because the 300 ASE treated radioactive wastes, the onsite low-level radioactive waste burial grounds were designated to receive

the drummed, solidified, cleaning liquius and the Details of these activities are described in Section 3.2.

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At the time of physical closure of the 300 ASE, the regulatory authority 20 for radioactive mixed waste was still being discussed between the EPA and the 21 U.S. Department of Energy (DOE); therefore, operations at the 300 ASE 22 proceeded according to existing administrative controls and internal 23 procedures. The EPA did not issue a clarifying notice on the application of RCRA to radioactive mixed waste until July 1986, several months after the During the time of operation of the 300 ASE, the RCRA requirements for temporary storage were not interpreted to apply to mixed waste. Formal regulatory approvals were not considered to be applicable prior to the dismantling of the 300 ASE due to uncertainties regarding the regulation of radioactive mixed waste.

After filing the 300 Area Solvent Evaporator Closure Plan, Revision 0 (November 1985); it was determined that the site lay within the boundary of a Comprehensive Environmental Response, Compensation, and Liability Act of 1980 <u>(CERCLA)-(EPA 1980) inactive radioactive waste burial ground. Subsequently.</u> the 618-1 Burial Ground has been included in the group of radiologically contaminated sites at the 300 Area (collectively referred to as the 300 Area Operable Units) that were used to generate scoring using the Hazardous Ranking System (HRS) for submission to the EPA as part of the process. The 618-1 Burial Ground lies within Operable Unit 300-FF-2. The juxtaposition of the 300 ASE closure area and the underlying 618-1 Burial Ground is a circumstance requiring special considerations for closure of the 300 ASE site under Washington Administrative Code (WAC) 173-303 Dangerous Waste Regulations (Ecology 1989), EPA regulations (EPA 1989), and for remedial action of the -618-1 Burial Ground under CERCLA.

Clean closure under RCRA regulations (WAC 173-303), in accordance with the Hanford Federal Facility Agreement and Consent Order (Ecology et al. 1989) is proposed for the 300 ASE. Justification for this proposal is based upon the absence of contamination from the 300 ASE as determined by random sampling 50 of the soil and concrete (Section 3.3 presents sampling plans). The extent of operation of the 300 ASE and the 618-1 Burial Ground, and the known characteristics of the wastes associated with them are presented in Sections 1.1.2 and 1.1.3.

1.1 HANFORD SITE AND FACILITY DESCRIPTION

A general description of the Hanford Site as a dangerous waste management facility is discussed in Section 1.1.1. This section is intended to provide the permit application reviewer or permit writer with an overview of the Hanford Site. The descriptions of the 300 ASE and the 618-1 Burial Ground are discussed in Sections 1.1.2 and 1.1.3, respectively.

1.1.1 Location and General Description

The Hanford Sité covers approximately 560 square miles of semiarid land that is owned by the U.S. Government and managed by the DOE-RL. For purposes of RCRA and WAC 173-303, the DOE-RL is the owner/operator and Westinghouse Hanford is the co-operator, with the DOE-RL, of certain hazardous waste management units on the Hanford Site. The Hanford Site is located northwest of the city of Richland, Washington, in the Columbia River Basin (Figure 1-1). The city of Richland lies approximately 5 miles from the southernmost portion of the Hanford Site boundary and is the nearest population center. In early 1943, the U.S. Army Corps of Engineers selected the Hanford Site as the location for reactor, chemical separation, and related facilities and activities for the production and purification of plutonium.

Activities at the Hanford Site are separated into numerically designated areas. The reactor facilities (active and deactivated) are located along the Columbia River in what are known as the 100 Areas. The reactor fuel processing and waste management facilities are located in the 200 Areas, which are on a plateau approximately 7 miles from the Columbia River.

_30____ The 300 Area, located north of Richland, contains the reactor fuel manufacturing facilities and several research and development laboratories. The 400 Area, 5 miles northwest of the 300 Area, contains the Fast Flux Test Facility used in the testing of liquid metal reactor systems. The 600 Area includes all locations not specifically given an area designation. .35 In north Richland, the 1100 Area contains facilities associated with administration, maintenance, transportation, and materials procurement and 37 - distribution. The 3000 Area, between the 1100 and 300 Areas, contains various engineering offices and administrative offices. "Administrative offices are also located in the 700 Area in downtown Richland.

1.1.2 The 300 Area Solvent Evaporator

The 300 ASE evaporator unit and associated storage barrels were located in the 300 Area of the Hanford Site from 1975 to 1985, but no longer exists since their demolition in 1985-1986 (see Section 3.2). They were situated in the northeast corner of the 300 Area near the 333 Building, the 334 Building, .48 and the 303-M-Building, as shown in Figures 1-2 and 1-3. The site for the 300 ASE was chosen for its proximity to the operations of the N Reactor Fuel Manufacturing facility in the 333 Building. The 300 ASE was a treatment tank -51---(evaporator) which received barrel-transferred solvent wastes from degreasing operations associated with the N Reactor Fuel Manufacturing facility. While

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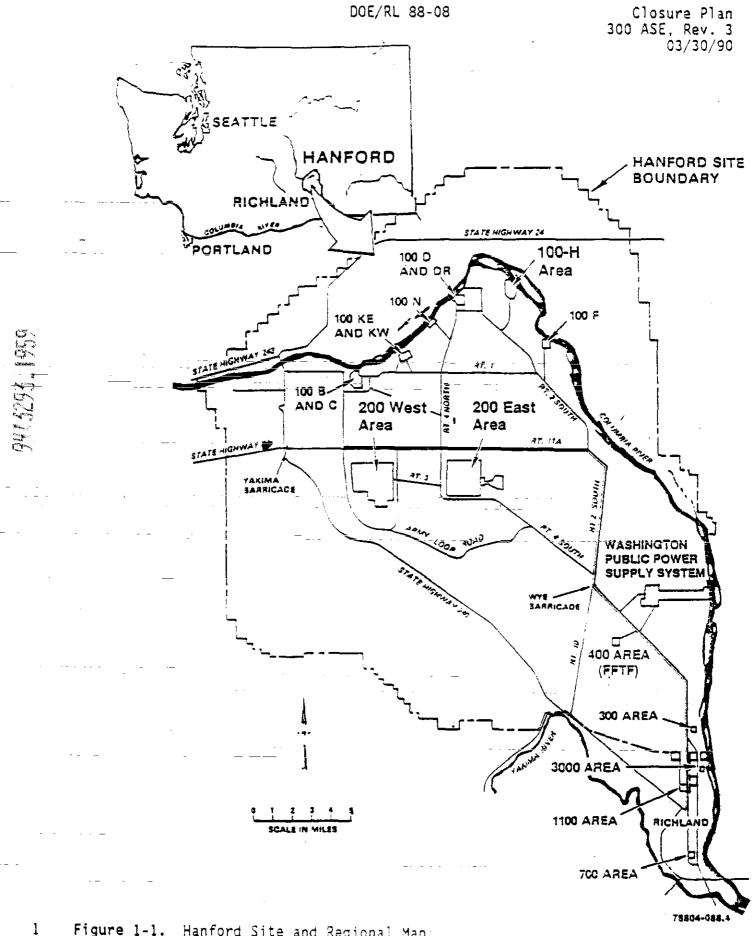


Figure 1-1. Hanford Site and Regional Map:

300 AREA SOLVENT EVAPORATOR UNIT

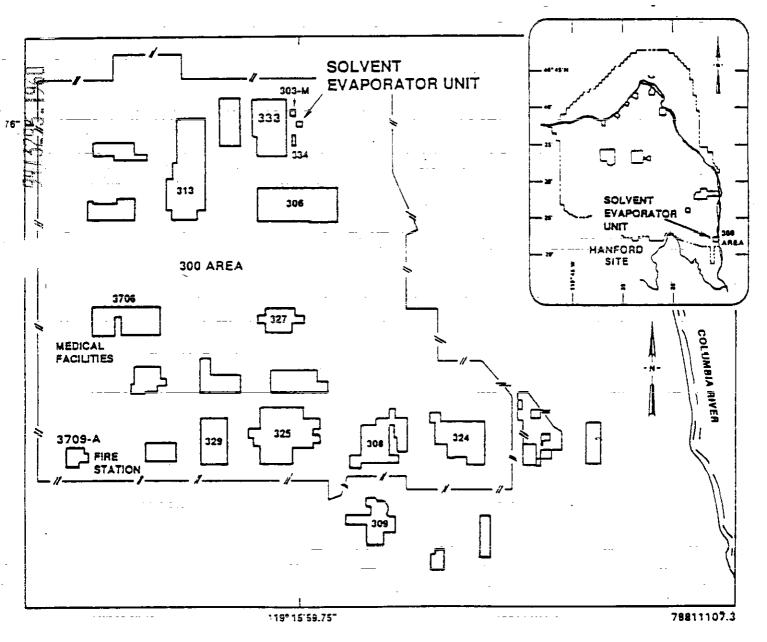


Figure 1-2. Solvent Evaporator Facility, 300 Area Map.

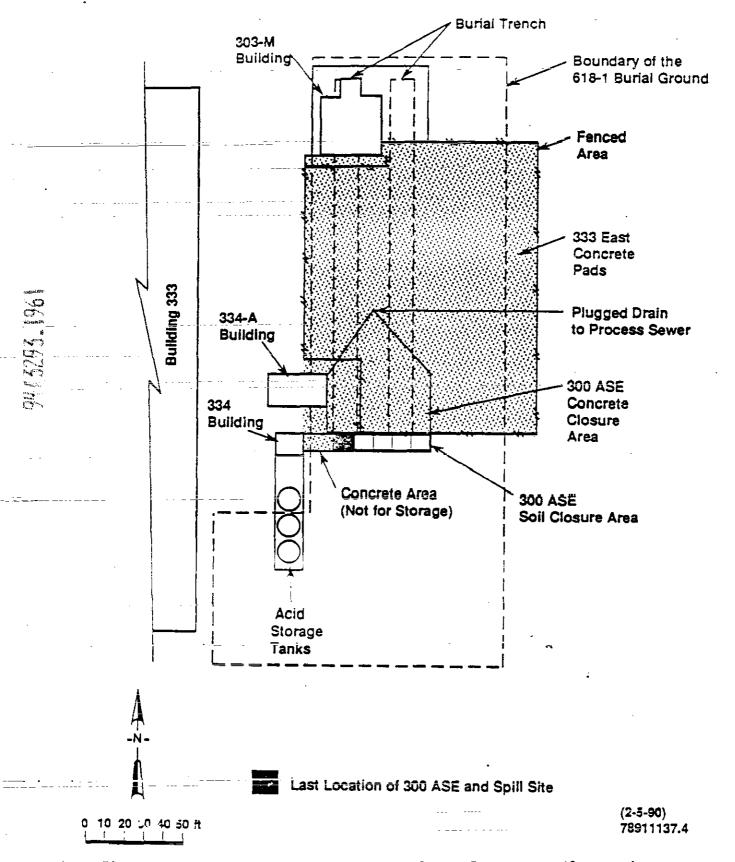


Figure 1-3. Layout of the 300 Area Solvent Evaporator Closure Areas and 618-1 Burial Ground.

.____l awaiting_transfers, the solvent waste_barrels were typically stored adjacent 2 to the evaporator.

The evaporator was a modified 'Brooks' load lugger; i.e., dumpster, 5 constructed of carbon steel with a hinged aluminum sheet metal canopy over the 6 top. The canopy (added in 1978) prevented entry of precipitation while 7 allowing airflow across the top of the solvent, and allowed one end to be 9 cutout side of the evaporator. Dimensionally, the 300 ASE was about 96 inches the bottom (Figure 1-4). The evaporator had been placed in four known 12 locations adjacent to the southwest portion of the original 333 East Concrete 13 Pad (Figure 1-3); two Tocations on the pad and two on the ground immediately ---14 south of the pad. When the evaporator was on the ground, it was positioned ≦15 ≦16 adjacent to the 333 East Concrete Pad to facilitate the introduction of solvent by means of a forklift with barrel tilter. The evaporator was -317 -situated on timbers which elevated it slightly above the pad or ground *18 (Figure I-5). A steam heating coil, which was added in 1978 or 1979, was 18 (Figure 1-5). A steam heating coll, which was added in 1978 or 1979, was 19—<u>situated within the 300 ASE to aid in the evaporation treatment process during</u> 20 the winter months. Steam condensate from the heating coil was discharged on 21 the gravel area near the west side of the evaporator.

> Since all waste degreaser solvents (uranium/radioactive and nonradioactive) were added to the 300 ASE, no segregation was made between uranium and non-uranium degreaser solvents. The same barrel pump generally was used to pump solvents from the degreasers into barrels. The degreaser solvent barrels were routinely stored (up to 1 year) within about 20 feet of the evaporator, until poured into the 300 ASE with the barrel tilter. Empty barrels were cycled back to the degreasers for refilling. Small quantities of solvents (from the paint shop and uranium-ethyl acetate-bromine solutions) were poured by hand directly into the evaporator.

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Besides the degreaser solvent barrels, the 333 East Concrete Pad (built in 1965) was used to store the following:

Uranium and non-uranium contaminated equipment

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· Drums of uranium contaminated oils, acid crystals from the waste acid 39 --- system, water-filled-drums of Zircaloy-2"/beryllium chips, and nitric acid containing uranyl nitrate

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 Water-filled drums of mixed uranium, Zircaloy-2, copper chips and 43 fines (finely divided uranium and Zircaloy-2 are pyrophoric).

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The water-filled drums of uranium chips and fines were the largest single type of material stored on the 333 East Concrete Pad. From 1965 until 1971. these drums were stored while awaiting oxidation in the adjacent 303-L Building, which was shutdown in 1971, then demolished and buried in the

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Zircaloy-2 is a trademark for zirconium with low percentages of tin. iron, chromium, and nickel.

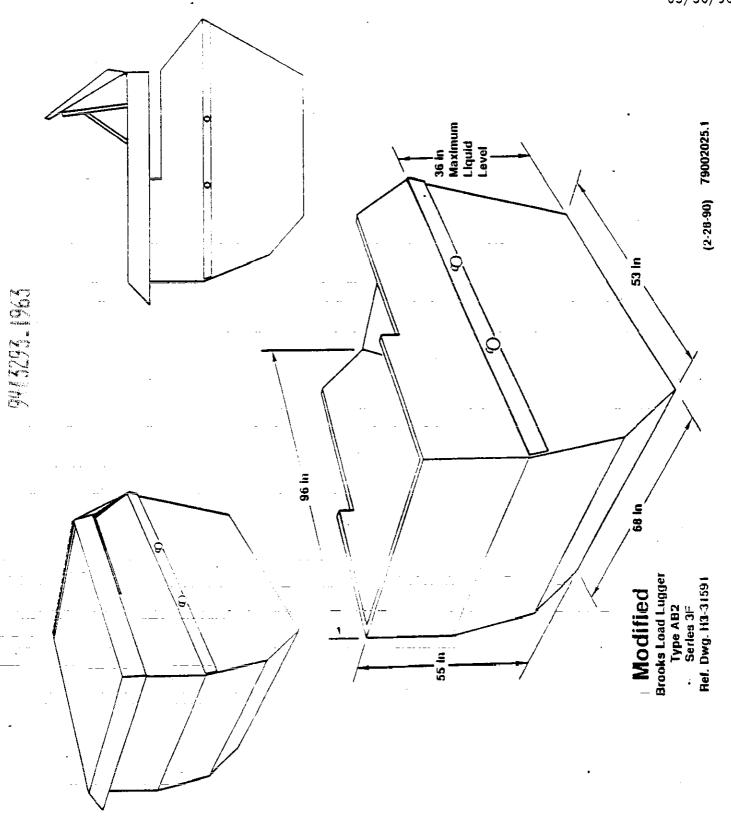


Figure 1-4. Schematic of the 300 Area Solvent Evaporator Unit.

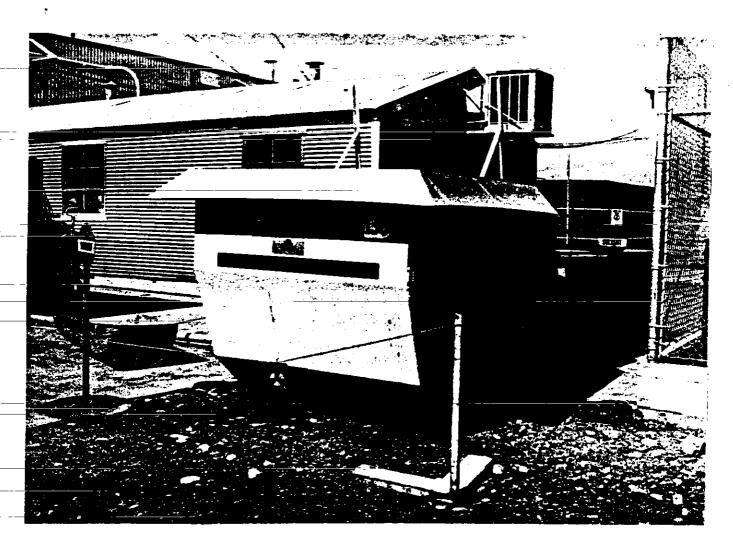


Figure 1-5. A 1985 Photograph of Solvent Evaporator.

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mid 1970's. From 1971 until the fall of 1982, up to 140 of these drums accumulated on the northwest portion of the 333 East Concrete Pad while ----3 -- awaiting disposal via concretion in the 304 Building. The concretion of this material was halted in the fall of 1982. Until the new 303-M Building was 5 Constructed and operational in-May 1983, the drums of uranium, Zircaloy-2 and ·····6····copper-chips-and-fines-were-moved to the southwest portion of the 333 East 7 Concrete Pad. By the time the 303-M Building was operable, 540 drums had accumulated. To reduce the fire hazard, these drums were placed 2 feet apart 9 and were sprinkled with cold water when the temperature was over 80 °F. All ---10 -but the eastern 25 feet of the 333 East Concrete Pad (which sloped eastward) drained into the floor drain. The drain was about 52 feet from the south and 37 feet from the west edge of the 333 East Concrete Pad (see Figure 1-3). This drain flowed into the 300 Area Process Sewer.

In early 1984, all the uranium contaminated equipment and materials were moved to the 303-K Building and its concrete and asphalt pad, except for the following items.

- Uranium chips and fines were confined to the small concrete pad (berm divided) on the west side of the 303-M Building which held about 88 drums. This pad utilized the drain to the 300 Area Process Trenches.
- The evaporator and waste solvent barrels were stored on the southwest

In September 1984, the west side of the present large concrete bermed fence and pad (minimum thickness of 2.5 inches) was 'poured over' the old 333 East Concrete Pad. The floor drain in the old 333 East 'Concrete Pad was plugged to prevent any spills from reaching the 300 Area Process Sewer. resulting fenced-in 'overlay pad' was constructed to store nonradioactive controlled materials for less than 90 days while awaiting analysis and disposition. Prior to construction of the 'overlay' pad, there was no designated storage area for the control of nonradioactive materials.

Additionally, in the spring of 1985, another concrete overlay pad (minimum thickness of 2.5 inches) was poured on the east side of the overlay pad which enlarged the original 333 East Concrete Pad area by 16.3 feet to the east and drained eastward onto the gravel area. The east side of the overlay pad has been used by maintenance personnel for the storage of non-controlled nonradioactive equipment.

The 300 ASE closure area consists of two sub-areas (see Figure 1-3), they are as follows:

- A gravel area on the south side of the 333 East Concrete Pad (approximately 10 feet wide by 50 feet long)
- An area about 50 feet long on the south portion of the original 333 East Concrete Pad that extends about 32 feet to the north and then tapers towards the original 4-inch diameter pad drain (because of inadequate documentation, this area must be considered as part of the

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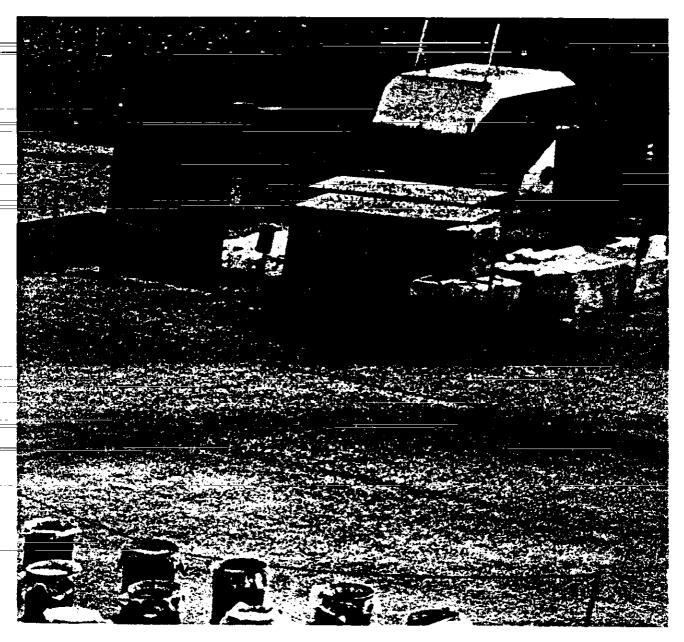
closure area even though there were no reported barrel or 300 ASE spills onto either the original or the overlay of the 333 East Concrete Pad).

Figure 1-6, a reproduction from a 1980 photograph, shows the 300 ASE adjacent to the original 333 East Concrete Pad in the eastern most position (approximately 45 feet east of the last 300 ASE location). In this figure. three solvent barrels can be seen to reside on the pad just east of the 300 ASE. The drums in the foreground are water-filled drums of uranium, Zircaloy-2 and copper chips and fines awaiting concretion. The boxes and equipment immediately in front of the 300 ASE are uranium contaminated materials awaiting disposition or reuse.

Figure 1-7 is a photograph of the 300 ASE and vicinity while in operation 15 in 1985. Figure 1-8 is a 1990 photograph of the closure area. Figure 1-9 is 16 a 1990 photograph of the 300 ASE closure site and 618-1 Burial Ground.

16 a 1990 photograph of the 300 ASE closure 3.03 and 1.17
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19 1.1.3 The 618-1 Burial Ground Underlying
20 the Solvent Evaporator
21
22 Underlying the entire 300 ASE closure area, at a depth of approximate 23 4 feet, is an inactive low-level radioactive solid waste burial ground
24 (current Hanford Site waste management identification number 618-1). The Underlying the entire 300 ASE closure area, at a depth of approximately 25 618-1 Burial Ground was in service from 1944 to 1951. The old and the 26 received uranium and other metallic and non-metallic materials from the facilities, trace amounts of plutonium (less 618-1 Burial Ground was in service from 1944 to 1951. The 618-1 Burial Ground 27 300 Area fuel fabrication facilities, trace amounts of plutonium (less than I gram) and other fission products, and incidental waste from the 29 300 Area laboratories in operation at that time. Apart from uranium, the metallic materials associated with the fuel fabrication process included graphite, oxides of tin, copper, aluminum, silicon, lithium, magnesium, calcium, and iron; and some stainless steel. Non-metallic materials -----33 -- associated with the fuel fabrication process included fluoride compounds of34 uranium, magnesium, and calcium; and chloride fluxes of sodium, potassium, and - barium. The fission products included isotopes of plutonium and strontium-90. 36 From 1943 to 1971; it is estimated that 10 curies of uranium (16.28 tons of matural uranium) were buried in all of the 300 Area burial grounds. The vast majority of this uranium was buried in the 618-1 Burial Ground, since this 39 burial ground was in service when high uranium loss activities were in 40-- operation. These activities included reduction of uranium tetrafluoride to metallic uranium, remelting and casting of billets, and machining of billets and fuel elements. Starting in 1951, these operations were done at the Feed Materials Production Center, Fernald, Chio. Documentation of the types and amounts of other fission products and incidental laboratory wastes is not available.

> The approximate boundaries of the 618-1 Burial Ground are shown in Figure 1-3 and in Appendix B, Figure B-1. The 618-1 Burial Ground covers a total area of 35,520 square feet. Within this total area, there are at least two trenches running north-south, which are approximately 16 feet wide by 230 feet long (at the surface) by 8 feet deep, and a series of 20 feet deep pits running east-west in the south end of the burial ground (Appendix B,



8002368-13CN (PHOTO TAKEN 1980)

-----Figure 1-6. 1980 Photograph of the Solvent Evaporator and Associated Solvent Barrels.

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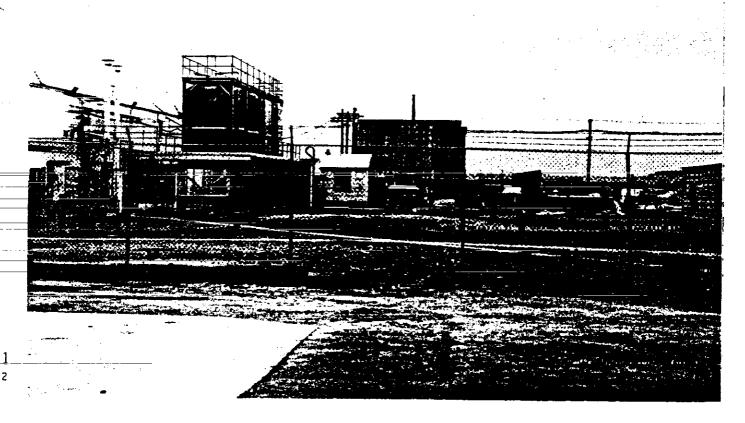


Figure 1-7. A 1985 Photograph of the 300 Area Solvent Evaporator and 618-1 Burial Ground.

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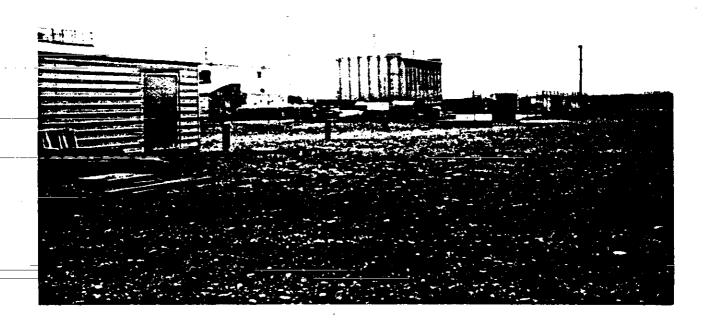
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90012637-9CN (PHOTO TAKEN 1990)

Figure 1-8. A 1990 Photograph of the 300 Area Solvent Evaporator Closure Site.

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90012637-16CN

Figure 1=9.--A-1990 Photograph of 300 Area Solvent Evaporator Closure Site and 618-1 Burnal Ground.

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1.3.1 Solvent Evaporator Waste

-____45____Wastes_treated_through_evaporation_in_the 300 ASE consisted of 46 approximately 71 percent-perchloroethylene, 9 percent 1,1,1-trichloroethane,

47 and 11 percent trichloroethylene by volume (Table 1-1). The remaining 48 9 percent of the waste consisted primarily of a mixture of ethyl -49 acetate/bromine solution (10 percent bromine). Small amounts of paint shop ------50 -solvents-such as methyl ethyl ketone, methylene chloride, and petroleum

52 metal particulates from degreasing activities were also present in the

Figure B-1). At the end of service (1951), the entire 618-1 Burial Ground typically was covered with 4 feet of fill. Supporting documentation appears in Appendix B regarding the 618-1 Burial Ground boundaries and operations.

The 618-1 Burial Ground has been included by the EPA on the National Priorities List (NPL) of federal sites requiring remedial investigation and regulation under CERCLA. Further information regarding this action is summarized in Sections 3.3 and 3.5.

1.2 SECURITY INFORMATION

13----- The entire Hanford-Site is a controlled access facility and is expected to remain so for the foreseeable future. The Hanford Site maintains around-16 information, and special nuclear material. The Hanford Patrol maintains a

15 the-clock surveillance for protection of government property, classified
16 information, and special nuclear material. The Hanford Patrol maintains
17 continuous presence of armed guards to provide Hanford Site security.
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19 Access is restricted to operational areas within the Hanford Site.
20 300 Area, the location of the 300 ASE, is one such operational area. All
21 personnel entering or leaving the 300 Area must display a DOE-issued security identification badge indicating authorization to enter the area and submi Access is restricted to operational areas within the Hanford Site. The 20 300 Area, the location of the 300 ASE, is one such operational area. All personnel entering or leaving the 300 Area must display a DOE-issued security identification badge indicating authorization to enter the area and submit to 23 a search of personal items carried into and out of the area. The 300 Area also has warning signs stating "DANGER--UNAUTHORIZED PERSONNEL KEEP OUT" posted at each entrance to the active portion. These signs are legible from a distance of 25 feet and visible from all angles of approach.

Hanford Site personnel receive security training in the form of required 29 security education and on-the-job training. Procedures for ensuring personnel compliance with security requirements, provisions for security education, and personnel training are maintained at the Hanford Site. Periodic security followed.

1.3 WASTE CHARACTERISTICS

The characteristics of the wastes and other materials associated with the .300 ASE, 618-1 Burial Ground, and process information are discussed in the following sections.

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evaporator and possibly incidental amounts of oil. Insoluble materials accumulated as sludge in the bottom of the evaporator. According to dangerous waste designation criteria (WAC 173-303-070, -101, -103, -9904, -9905, -9906, and -9907), the initial waste would have the designations WPO1, WCO1, WTO1, F001, F002, F003, F005, and D001 as Extremely Hazardous Waste, largely due to the perchloroethylene (aka tetrachloroethylene) component. A summary of the waste designation calculations is presented in Appendix C.

----- Table 1-1. Solvent Waste Components.

| <u>Waste component</u> | Volume (percent) | Specific gravity |
|--|------------------|-----------------------------|
| Perchloroethylene 1,1,1-trichloroethane | 71 9 | 1.63 1.34 |
| Trichloroethylene | 11 | 1.34 |
| Ethyl acetate/bromine ^a | 9 | 1.12 0.8 1.33 0.64 |

Principal component of the remaining 9 percent.

These constituents had a minimal contribution to the overall amount and type of waste handled in the 300 ASE.

In January 1985, a single sample of the 300 ASE solvent was collected for an inorganic analysis, which was performed in March 1985 as part of waste form/storage compatibility activities. The sample was submitted to Pacific Northwest Laboratory (PNL), Richland, Washington, for analysis of uranium by X-ray fluorescence (XRF) and for other elements by inductively coupled plasma-atomic emission spectroscopy (ICP-AES). The lag time between sampling and analysis was the result of routine laboratory practices. The concentrations of the elements analyzed by ICP-AES are presented in Table 1-2. The concentration of uranium in the solvent was below detection limit (less than 10 micrograms per milliliter). The concentrations of beryllium, volatile organic compounds (VOC), and total organic carbon (TOC) were not determined because the Byproduct Ruling (10 CFR 962) was not in effect; therefore, this information was not required.

The ICP-AES analysis was undertaken to evaluate the potential of the solidifying agents for stabilizing the 300 ASE waste. The solidification agent evaluation was based primarily on the proportions of aqueous and organic phases in the sludge. The inorganic analysis was performed to provide general information on the waste content and was not intended to be used as a representative sample for waste characterization or designation purposes. It was already known, via process knowledge, that the waste would be designated as an Extremely Hazardous Waste. Nevertheless, the ICP-AES results indicate the metal content in the waste and are provided in this

b Denotes paint shop solvents that may have been present.

Table 1-2. Results of the Inductively Coupled Plasma-Atomic Emission Spectroscopic Analysis on Waste Solvent (1985).

| 4 5 | - | Detection ^a <u>Limit μq/ml</u> | - | NaOH/Zr ^b <u>uq/m</u> l | KOH/Ni ^c <u>u</u> q/ml | Average |
|-----|----------------|--|-------|---------------------------------------|---------------------------------------|-----------------|
| 6 | Âluminum | 0.03 | | 6 | 10 | <u> 2971111</u> |
| 7 | Antimony | 0.05 | | • | | |
| 8 | Arsenic | 0.08 | | | | |
| 9 | Barium | 0.002 | | | | |
| 10 | Boron | 0.01 | | ⁻ 5 | 2 | 4 |
| 11 | Cadmium | 0.004 | - | _ | _ | • |
| 12. | -Calcium | 0.01 | | - 46 | 52 | 48 |
| 13 | Cerium | 0.04 | ·* pa | • | · · · · · · · · · · · · · · · · · · · | 10 |
| 14 | Chromium | 0.02 | | | | |
| 15 | Cobalt | 0.01 | | | | |
| 16 | Copper | 0.004 | | | | |
| 17 | Dysprosium | 0.004 | | | | |
| 18 | Europium | 0.002 | | • | | |
| 19 | Gadolinium | 0.1 | | | | |
| 20 | Iron | 0.005 | | 6 | 78 | 30 |
| 21 | Lanthanum | 0.008 | | | | |
| 22 | Lead | 0.06 | • | | | |
| 23 | Lithium · ···· | 0.004 | | 4 | 2 | 3 |
| 24 | Magnesium | 0.06 | | | | • |
| 25 | Manganese | 0.002 | | | | |
| 26 | Molybdenum | 0.01 | | | | |
| 27 | Neodymium | 0.02 | | | | - |
| 28 | Nickel | 0.02 | | • | ND ^d | • |
| 29 | Phosphorus | 0.1 | | 18 | 25 | 20 |
| 30 | Potassium | 0.3 | | | ND | |
| 31 | Ruthenium | 0.05 | | | | |
| 32 | Silicon | 0.02 | | 20 | 28 | 24 |
| 33 | Sodium | 0.01 | | ND | 46 | 46 |
| 34 | Strontium | 0.002 | | | | |
| 35 | Tellurium | 0.06 | | | | |
| 36 | Titanium | 0.02 | | | | |
| 37 | Zinc | 0.02 | | | | |
| 38 | Zirconium | 0.008 | | ND | 2 | 2 |
| 39 | | | | | _ | - |
| 40 | | | | | | |

^{*-}ICP-AES analysis performed for the elements listed. No results shown for concentrations below detection limit.

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50 closure plan as the only analytical data for the 300 ASE waste. As 51 regulations and regulatory authority regarding mixed waste had not been 52-established at the time the sample was taken, no formal notifications were

Sodium hydroxide fusion in a zirconium crucible was performed to solubilize the sample.

Potassium hydroxide fusion in a nickel crucible was performed to solubilize the sample.

d ND = Not determined.

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requested or received concerning the sampling or monitoring. Because the sampling was not conducted to fulfill a regulatory requirement, a formal sampling plan-was not written and the original of the laboratory analysis documentation was not retained.

Beryllium was a possible constituent of the waste, but because its concentration was not determined, its maximum concentration in the solvent was ·calculated. The principle source of soluble beryllium in the waste was from particulate matter derived from the degreasing of zirconium alloy braze rings. The braze alloy contained 93 percent zirconium, 4.75 to 5.25 percent beryllium, 1.2 to 1.7 percent tin, 0.07 to 0.20 percent iron, 0.05 to 0.15 percent chromium, and 0.03 to 0.08 percent nickel by weight. Based on the composition of this alloy and the amount of zirconium in the solvent (2 parts per million), the maximum amount of beryllium that could have been present was about 0.11 parts per million. The equivalent concentration of

present was about 0.11 parts per million. The equivalent concentration this amount of beryllium is 0.000011 percent by weight.

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Steam condensate that dripped to the soil on the west side of the evaporator, contained trace amounts of the steam treatment substance (Dearborn Steamate 2004). The Steamate contained diethylaminoethanol, morpholine, and cyclohexalamine (less than 8 percent each), but because steam treatment process involved a mixture ratio of approximate treatment mixture to 12 000 --13 morpholine, and cyclohexalamine (less than 8 percent each), but because the steam treatment process involved a mixture ratio of approximately 1 gallon of treatment mixture to 12,000 gallons of water, the combined solution (steam condensate) is not a regulated waste.

1.3.2 The 618-1 Burial Ground Waste

Because of the lack of suitable documentation, the characteristics of the wastes in the underlying 618-1 Burial Ground are not well known. The only known documented information is from the Hanford Waste Information Data System (WIDS) database. Only plutonium-239 and plutonium-240 have been reported as 33 being in detectable concentrations within the 618-1 Burial Ground, with the total plutonium inventory calculated to be 0.077 curies decayed through 35 December 12, 1986. According to this database, other radionuclides and inorganic and organic contaminants were either not detected or were not analyzed. However, undocumented information on utilization of the _38 _618-1_Burial_Ground_indicates that it was a primary site for the disposal of large quantities of scrap uranium waste (i.e., pieces of end rods for fuel .40 _elements)_for all_reactor fuel manufacturing operations at the time. These fuel rods contained naturally occurring uranium. Also, other radioactive wastes associated with fuel fabrication, and other 300 Area waste activities, may be buried at this site.

Although detailed information on the total amount of waste disposed in the 618-1 Burial Ground is not available, estimates have been made on the basis of the extent of the activities during the time of operation. The 618-1 Burial Ground is estimated to have received up to 350 tons of waste

^{..... 49 ... - ...} Steamate is a trademark of the Dearborne Division of W.R. Grace and Company.

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occupying a volume of 37,000 cubic yards. The documented maximum inventory of radionuclides received is estimated to be about 16.28 tons of uranium and approximately 0.035 ounces of plutonium (Appendix B).

1.4 SOLVENT EVAPORATOR PROCESS INFORMATION

8 The 300 ASE was utilized for evaporation treatment with associated barrel 9 - storage of volatile spent solvents. Administrative controls were used to UNI-M-46, ECC-114, Appendix D). The evaporation treatment process was enhanced during the winter months by using a clip-on steam heating coil -- 13 immersed in the 300 ASE solutions. Although the temperature of the solvent in the evaporator was not monitored, the temperature of the steam heating coil the evaporator was not monitored, the temperature of the steam heating coil was about 100°C. Steam was delivered to the heating coil through a hose at a 16 gage pressure of 15 pounds per square inch. The evaporator operated continuously when use. However, the steam heating coil only operated during the winter months when solvent levels were highest (see Procedure UNI-M-58, 19 ECC-14, Appendix D).

20 21 Perchloroethylene, trichloroethylene, and 1,1,1-trichloroethane were persent in the 300 ASE as waste degreasing solvents, which may have been was about 100°C. Steam was delivered to the heating coil through a hose at a

22 persent in the 300 ASE as waste degreasing solvents, which may have been contaminated with uranium, Zircaloy-2, and Zircaloy-2/beryllium from degreasing uranium metal billets, cladding, braze rings, copper, coppersilicon alloy, and miscellaneous tools and parts. The 300 ASE was established as a treatment facility (evaporator) mainly for these fuel manufacturing waste solvents. Trichloroethylene was the primary degreasing solvent treated in the 300 ASE through 1976-77. Perchloroethylene subsequently became the primary degreasing solvent. Ethyl acetate/bromine solutions from laboratories and paint solvents from maintenance facilities also were treated in the 300 ASE. Any nonvolatile components that were only soluble in the solvent (e.g., oil) 32 would have accumulated as sludge at the bottom of the 300 ASE as the solvent was evaporated. A process procedure (UNI-M-46, ECC-114, Appendix D) stipulated that 17C-type 55-gallon drums, designed to receive sludge-type materials, were kept near the site. However, during the active life of the 300 ASE, there was not enough sludge to warrant clean out or use of the 17C-type drums.

Administrative controls limited the use of the 300 ASE to organic ---------40---solvents that could not be disposed of through the onsite waste oil system, and prevented treatment of incompatible solvents (Procedure UNI-M-46, ECC-114, 42 Appendix D). Heavy oils, greases, and aqueous solutions were disposed of in accordance with Procedure UNI-M-46, ECC-104 (Appendix D). To ensure proper operation and maintenance of the evaporator, facility management conducted inspections on an annual basis (Procedure UNI-M-46, ECC-114, Appendix D).

No special procedures or precautions existed to preclude possible leaks ----48 -- from the evaporator or to test its integrity.-- However, based upon normal procedures, it is assumed that initially, the evaporator was visually inspected for flaws, and informal inspections of the evaporator were conducted 51 over the period of its use by personnel in adjoining buildings on an irregular 52 basis. The evaporator was elevated off the ground on timbers to facilitate

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1- the detection of any leak. The evaporator also was isolated from normal traffic flow to minimize potential accidents.

The typical process for emptying the waste solvent barrels was to pour them through the hinged top into the evaporator with the forklift barrel tilter, while under the supervision of operations personnel. If the evaporator was at or near its maximum capacity, the barrels were temporarily stored on the 333 East Concrete Pad adjacent to the evaporator (Figure 1-3). Although no records were retained on how long the barrels were stored, it could have been from 6 months to 1 year before the waste was poured into the evaporator. Barrels were stored on pallets to elevate them above the 333 East Concrete Pad and away from possible accumulated rainwater. Forklifts, equipped with barrel-handling attachments, were used for barrel relocation and large volume solvent transfers to the evaporator.

Solvent was poured into the evaporator in one of three ways: (1) large containers (55-gallon barrels) were lifted with a forklift equipped with barrel-handling attachments (barrel tilter) and poured into the evaporator; (2) the barrels were pumped out with a portable pump; or (3) the contents of smaller containers were poured into the evaporator by hand. Internal job control_procedures_(Appendix_D) were used in the process to prevent spills and health hazards during operation of the evaporator, because no special regulatory procedures were specifically implemented. This particular type of operation relied on the skills and experience of the operator to prevent spills and to ensure that the work was performed safely.

The empty solvent barrels generally were not rinsed as they were reused several times for the same purpose. Occasionally, empty barrels may have been temporarily stored on the 333 East Concrete Pad pending disposal or returned to the degreasers for reuse. At the end of the barrel's useful life, it was crushed and disposed of as radioactive waste.

The 333 East Concrete Pad was utilized for other non-300 ASE uses; e.g., uranium-contaminated-equipment and materials storage as noted in Section 1.1.2. It was primarily the other usages and expansion and subsequent fencing of the 333 East Concrete Pad that necessitated the relocation of the 300 ASE during its 10-year operating life.

Over the 10-year_life of the 300 ASE, approximately 6,000 gallons of regulated waste were treated through evaporation, or an average of approximately 600 gallons per year (see Section 3.2.1 and Appendix A). The Maximum Treatment Capacity (process design capacity) has been estimated at 43 approximately 220 gallons per day (Appendix A). The 300 ASE had a maximum 44 fill depth of 3 feet which allowed a maximum storage capacity of about 800 45 gallons (overflow volumetric limit).

On two occasions, the Hanford Environmental Health Foundation performed 48-temporary ambient air monitoring near the 300 ASE using pre-calibrated battery operated pumps and charcoal sorption tubes. Samples were analyzed by gas chromatography. The results of air monitoring are documented in two letter reports, as presented in Appendix F.

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Only one spill is known to have occurred at the 300 ASE. Although no formal spill report was written, it is known that between March 1 and 14. - 3-1985, water from steam condensate overflowed the evaporator. This water was discharged onto the soil at the last evaporator location, as shown in _ 5. Figure 1-4...This_spill_resulted.when a..small..hole.developed.in a.metal 6 fitting attached to the steam coil that allowed steam condensate (i.e., water) to slowly fill the evaporator to overflowing.

The overflow would have spilled from the cutout (north facing) side of -the evaporator -- Because this angled side of the evaporator overhung the northern edge of the 333 East Concrete Pad, some of the overflow could have possibly discharged onto the concrete; however, it has been estimated that little, if any, solvent was present in the overflow because the solvents have higher densities than water (Table 1-1). Thus, only very small amounts of the solvents dissolved in the water (Section 3.3), could have overflowed the evaporator. Although there have been no records of solvent leaks from the barrels stored on the concrete pad, the consequences of an undetected leak onto the concrete were evaluated together with those of evaporator spillage onto the concrete.

Worst-case scenarios of spills onto the soil and onto the concrete were developed in conjunction with the Sampling and Analysis Plan (Appendix E. Section E-2, Contamination Scenarios and Assessments) to calculate the types and amounts of residual waste materials that could be expected to remain in the soil and in the concrete. The modeling results for spillage onto the soil -have indicated that-no-significant-amount-of-water/solvent should remain in the soil. -Similarly, the modeling results for spillage onto the concrete have indicated that no significant amount of solvent from barrel leakage should remain in the concrete.

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2.0 CLOSURE PERFORMANCE ACTIVITIES

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4 --- The clean-closure-for-the 300 ASE will-continue to perform the following 5. functions.

-8 9 10 Protect human health and the environment by controlling, minimizing,
 and/or eliminating the escape of dangerous waste, dangerous waste constituents, leachate, contaminated run-off, or dangerous waste
 decomposition products to the ground, surface water, groundwater, or the atmosphere.

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 Restore the land to a condition that will support its intended subsequent use given the nature of the previous regulated waste activity.

• Minimize the need for further maintenance.

The closure of the 300 ASE involves the following steps.

22 23 Removal and solidification of the solvent waste (completed 1985).

23 24 25 Cleaning and demolition of the 300 ASE unit and associated waste barrels (completed 1986).

26 27 Transportation and disposal of the solvent waste and the 300 ASE facility (completed 1986).

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4. Soil and concrete sampling and analysis will be initiated following Ecology's approval of the sample plan.

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5: Evaluation of sampling data will start after completion of field sampling activities.

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6. Closure of the facility: Clean closure if the soil and concrete are not contaminated from 300 ASE constituents; otherwise, it is proposed that final disposition of the site should be determined through the Remedial Investigation/Feasibility Study in conjunction with Operable Unit 300-FF-2.

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 Ecology's acceptance of the results/evaluation of soil and concrete sampling.

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44-- The first three steps were completed in 1985 and 1986 and are discussed in detail in Section 3.2.

47---- The 300 ASE Closure Plan will be available in Public Reading Rooms as 48 part of the Administrative Record for the Hanford Federal Facility Agreement 49 and Consent Order.

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--- 3.0 -DESCRIPTION-OF CLOSURE ACTIVITIES

The primary strategy for closure of the 300 ASE is clean closure of the 5 site. In 1985 and 1986, initial closure activities involved removing the waste inventory and dismantling the facility to minimize potential danger to 7 - onsite personnel and the environment. The closure activities that remain to be performed include (1) soil and concrete sampling and analysis to evaluate contamination of the closure area, (2) evaluation of data, and (3) closure of the facility.

Clean closure of the site is contingent on verification of an absence of soil and concrete contamination originating from the 300 ASE. This contingency is to be assessed using information obtained from implementation -15- of the Soil and Concrete Sampling and Analysis Plan (Appendix E). In the event that more extensive remediation is required (i.e., clean closure is not possible or practical), the remaining activities necessary for final 18 clesure/post-closure monitoring are proposed to be performed in conjunction -19 - with the inactive site activities planned for Operable Unit 300-FF-2.

Because the 618-1 Burial Ground completely underlies the 300 ASE site, 22 assessment of any potential impact on groundwater resulting separately from the 618-1 Burial Ground is not possible. Given these special conditions, groundwater sampling and analysis are not included in the closure activities associated with the 300 ASE. Clean closure of the facility will be based on information derived from implementing the soil and concrete sampling and analysis plan.

3.1 MAXIMUM EXTENT OF OPERATION

The active life of the 300 ASE facility ceased in November 1985 (Table 3-1). The maximum extent of operation is known to have been exceeded only once at the time of the steam heating coil failure that filled the evaporator with water to overflowing.

3.2 REMOVAL AND MANAGEMENT OF HAZARDOUS WASTES

____ Information concerning the removal and management of hazardous waste is presented in the following sections.

3.2.1 Estimate of Maximum Inventory of Hazardous Wastes

The 300 ASE received solvents used in the 300 Area reactor fuel manufacturing facilities. The maximum annual inventory of hazardous wastes treated at any time during the life of the facility was approximately 600 gallons. Thus, the maximum volume of chemicals treated in the 300 ASE over the 10-year operating term has been estimated to be 6,000 gallons. Perchloroethylene constituted approximately 71 percent (4,260 gallons).

11 percent was trichloroethylene (660 gallons) and 1,1,1-trichloroethane was approximately 9 percent (540 gallons). The remaining 9 percent (540 gallons) was composed of primarily_ethyl acetate/bromine, with some paint shop solvents (see Table 1-1).

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| 6 | | ronology of 300 Area Solvent Evaporator Closure Activities. |
|-----------------|----------------|---|
| 7 | Date | Activity |
| 8 | January 1985 | Water solvent sampled |
| 9 | March 1985 | Analysis performed on waste solvent |
| 10 | August 1985 | Deliveries to 300 ASE suspended; last solvents added |
| 11 | September 1985 | Part A application submitted to Ecology and EPA |
| 12 | November 1985 | Heating process terminated; final shutdown; solidification of final waste inventory initiated; demolition initiated Interim Status Closure Plan (Rev. 0) submitted to Ecology and EPA |
| 13 ⁻ | February 1986 | Disposal of solidified waste inventory at the 200 West Area Low-Level Burial Ground |
| 14 | March 1986 | Demolition of 300 ASE facility completed |
| 15 | July 1986 | Disposal of burial box containing the dismantled 300 ASE and equipment in 200 West Area Low-Level Burial Ground |
| 16 | April 1988 | Submittal of revised 300 ASE Interim Status Closure Plan (Rev. 1) to Ecology |
| _17. | September 1988 | Notice of Deficiency on Closure Plan (Rev. 1) received from Ecology |
| 18 | February 1989 | Submittal of revised 300 ASE Closure Plan (Rev. 2) to Ecology |
| 19 | April 1989 | Notice of Deficiency on Closure Plan (Rev. 2) received from Ecology |
| 20 | January 1990 | Ecology accepts the NOD responses and authorizes submittal of the 300 ASE Closure Plan (Rev. 3) by March 30, 1990 |
| 21 | March 1990 | Submittal of revised 300 ASE Closure Plan (Rev. 3) to Ecology |
| 22 | November 1990 | Notice of Deficiency on Closure Plan (Rev. 3) received from Ecology |
| 23 | February 1991 | Ecology accepts NOD responses and authorizes submittal of |

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June 1991

September 1992

Page changes issued to document holders

25 -- June 1992 -- Ecology requested additional page changes

page changes (Rev. 3A) for 300 ASE Closure Plan

Page changes (Rev. 3B) issued to document holders.

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The maximum inventory of hazardous wastes (i.e., the maximum amount of -waste in the unit at any one time) would have been 800-gallons volumetric overflow capacity).

3.2.2 Removal and Management of Hazardous Waste Inventory

After August 1985, spent solvents were no longer received from the operating facilities. Final shutdown was initiated in November 1985 when the treatment process was terminated. The remaining solvents staged at the nearby concrete pad and from the evaporator were stabilized with absorbent agents. Approximately 500 gallons of spent solvent remained in the 300 ASE at that time-and-the-following-steps-were-taken-to-remove and solidify the solvent waste. A copy of a sample procedure for the solidifying and packaging of waste-solvents-(UNI-Process Work-Request-Number B-441 and UNI-M-57, D-411) is included in Appendix D.

- Obtained equipment (e.g., steel pan, hand pump, shovel, air mixer, forklift truck, empty 30- and 55-gallon 17-H drums) and materials (e.g., dolomite, water, Envirostone liquid emulsifier and cement).
- 2. Placed a 30-gallon drum with lid inside a 55-gallon drum and utilized the steel pan as a catch basin.
- Filled the void between the drums with dolomite, an inert filler material, and then removed the lid from the 30-gallon drum.
- Pumped 13 gallons of liquid solvent, 6.5 gallons of water, and 1.5 gallons of Envirostone liquid emulsifier into the 30-gallon drum.
- Used an air operated mixer to stir contents of the 30-gallon drum for two minutes.
- Added 160 pounds of Envirostone cement to the 30-gallon drum contents with mixer running and stirred for an additional 10 to 15 minutes.
- Moved drums via forklift truck to the adjacent concrete storage pad and allowed cement to cure for at least 24 hours.
- Repeated steps 2 through 7 until all of the liquid solvent and solvent 41 42 sludge, which was removed with a shovel from the bottom of the 300 ASE, 43 had been solidified.
 - Placed contaminated tools in the 300 ASE and rinsed tools, as well as the 300 ASE, and solidified the rinsate by performing steps 2 through 7.
 - 10. Filled remaining space in the 30-gallon drums with dolomite and sealed drum with lid, lock ring, and bolt.

⁵¹ Envirostone is a trademark of the U.S. Gypsum Company.

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- 11. Filled void space between 30- and 55-gallon drums with dolomite.
- Sealed the 55-gallon drums, labeled, and radiologically surveyed.
- 5 13. Placed drums in the waste materials storage area east of the 333 Building until shipped for disposal.
- After the liquid a second of the evaporator was liquid was removed during the equipment laken, since none were required for mixed waste at that time. The 300 ASE of the rinsed thoroughly with water during the cleaning process (see step 9, 15 Section 3.2.2), although scrubbing or pressure spraying was not utilized in the rinsing process.

 After the metal dumpster was cleaned, a slight amount of pump and tools were rinsed with water disposed of toost. 3.2.2.1 Cleaning and Demolition of Solvent Evaporator. After the liquid and cleaning process. Some residual perchloroethylene and 1,1,1-trichloroethane. taken, since none were required for mixed waste at that time. The 300 ASE was

noticed; however, the dumpster appeared to be in good condition. The electric pump and tools were rinsed with water, wiped down and checked by a radiation

By the end of March 1986, the 300 ASE had been cut up using a cutting torch, which avoided contaminating mechanical cutting tools. Then the pieces were placed in a standard 4 by 4 by 8-foot (128 cubic feet) plywood burial box, designated C-39 (see Burial Checklist 3-5B-1A-1 in Appendix D). Clothing, miscellaneous paper, plastic products, cloth utilized during this operation, the heating coil, and related piping were disposed of in this box. The void space in the box was partially filled with inert absorbent material (vermiculite clay). A sample copy of a Fuels Maintenance Work Authorization for cutting up and boxing of the 300 ASE is provided in Appendix D.

-34-3.2.2.2 Transport and Disposal of Solvents and Solvent Evaporator. The drums of solidified solvents, rinsate, and the 300 ASE burial box were transported in compliance with U.S. Department of Transportation regulations (DOT 1988). The drums and 300 ASE burial box were loaded by a forklift truck onto a semi-trailer truck and transported to the 200 West Area Low-Level Burial Grounds. Fifty-seven 55-gallon drums of solidified solvent, sludge, and rinsate were generated from the cleanup effort and buried during - February 1986 (Burial Compliance Checksheets 3-1A-7G-I, 3-1A-7L-1, and Burial Record 313-UNC-80-10; Appendix D). The 300 ASE burial box had a total volume of 128 cubic feet and was buried in July 1986 (Burial Compliance Checksheet 3-5B-1A-1 and Burial Record 313-UNC-86-4).

46 · 3.2.2.3 Hazardous Waste Management Units. All hazardous waste management units at the Hanford Site are under the EPA/State Identification. Number WA789008967, which provides interim operating status designation.

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3.3 DECONTAMINATION AND REMOVAL OF HAZARDOUS WASTE RESIDUES

---5-persist in the soil at the site, will be evaluated by means of a Soil and 6 Concrete Sampling and Analysis Plan (Appendix E). Based on the spill scenario described in Section 1.4, and the nature of the wastes (i.e., specific gravities), it is likely that little, if any, waste was discharged from the 9 300 ASE when it was inadvertently filled with water to overflowing from the 10 leaky steam heating coil system. The amount of primary solvents in the -11-300 ASE expected to have been discharged with the less dense water for a 12-100-gallon spill, is estimated to be a maximum of 200 milliliters for 1,1,1-trichloroethane and 50 milliliters for perchloroethylene, based on solubilities (25°C values) alone. - Such small amounts of solvent evaporator

volatile components (if any) also would be likely to have since evaporated

16 from the soil (Appendix E, Section 2.4.1).

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18 Evaluation of the type and extent of potential contamination present in
19 the soil and concrete resulting from operation of the 300 ASE could have been
20 affected by the possible upward migration of waste (e.g., by vapor or gas
21 transport) from the underlying 618-1 Burial Ground, and also due to the
22 uncertainties associated with sources of the engineered soil cover. Because
23 of these uncertainties, soil and concrete analysis will be largely confined to
24 those waste constituents known, and suspected to be associated with the
25 300 ASE (see Appendix F. Sections E-1.2.1 and E-1.2.2). 25 300 ASE (see Appendix E, Sections E-1.2.1 and E-1.2.2).

Inorganic constituents having concentrations at or below detection limits 28 in the analysis of the raw waste (Table 1-2) have been omitted from the list 29 of constituents to be analyzed. The elements silicon, aluminum, iron, 30 calcium, sodium, and phosphorous also have been excluded as they are primary 31 constituents in the native rocks and soils that occur at concentrations far in -----32 excess (1,000 to 500,000 micrograms per gram) of those in the raw waste (less than 100 micrograms per gram). The amounts of fuel fabrication related inorganic constituents in the initial solvent alone, as well as those that 35 would remain as residue in the soil after evaporation, are below the regulated 36 concentrations. For example, the maximum amount of beryllium in the initial ----- 37 --- solvent, is significantly below regulated concentrations (equivalent -----38--concentration of 0.000011 weight percent; WAC 173-303-9906). However, the inorganic fuel fabrication related constituents have been included in the list 40 of analytes (Table 3-2) as a conservative measure. All organic constituents obtained by Methods 8240 and 8270 (SW-846, EPA 1986) will be analyzed because 42 they are measured concurrently in the analysis. However, only those known and 43 suspected to be associated with the 300 ASE will be evaluated for closure purposes. The other data will be reported for informational purposes, as Ecology has requested.

Evaluation of the 300 ASE soil will be based on the composition of the soil compared to the composition of the local background soil for the constituents listed in Table 3-2. The local background, i.e., the soil cover baseline material is intended to serve a special type of local or area background (Ecology 1991) because it consists of soil that was introduced to the area as a cover for the underlying burial ground that may be distinct from

other natural or anthropogenic background in the area. Justification for the selection of the baseline and for baseline sample locations is provided in Appendix E, Section E-5. The constituents listed in Table 3-2.

Table 3-2. The 300 Area Solvent Evaporator Analytes and Performance Standards.

| Category-Constituent | | Initial action level | | Alternative action level | |
|---|-------------|----------------------|----------|--------------------------|--|
| | Soil | Concrete | Soil (| Concrete | |
| 1- 300 ASE primary organic constituents | | | | | |
| Perchloroethylene (PCE) | a | Ь | С | С | |
| 1,1,1-trichloroethane (TCA) | a | b | С | С | |
| - Trichloroethylene (TCE) | a | _ b | Ċ | С | |
| Methyl ethyl ketone (MEK) | a | b | С | С | |
| Ethyl acetate | a | ` b | С | С | |
| Dichloromethane (methylene chloride) | a | b | С | С | |
| Petroleum naptha | С | С | - | _ | |
| 2- 300 ASE secondary organic constituents | (i.e., deg | radation p | roducts) | | |
| 1,1-dichloroethylene (DCE) | a | b | c | С | |
| trans-1,2-dichloroethylene (DCE) | a | Ь | С | С | |
| 1,1-dichloroethane (DCA) | a | a | C · | C | |
| 1,2-dichloroethane (DCA) | a | b | С | С | |
| Vinyl chloride | a | ь | С | С | |
| 3- Inorganic constituents (related to fue | l fabricati | on) | | | |
| Zirconium | a | d | b | d | |
| Beryllium | a | d | Ь | d | |
| Bromine | a | ď | b | d | |
| Uranium | · d | d | d | d | |
| Copper | a | d | b | d | |
| 4- Inorganic constituents (related to pai | nt shop sol | vents) | | | |
| Barium | a | ď | С | ď | |
| Cadmium | a | d | С | d | |
| Lead | a | d | С | ď | |
| Silver | a | d | С | d | |

a Concentrations that exceed baseline (local background) threshold levels. b Concentrations that exceed limits of quantitation (LOQ), i.e., the level

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above which quantitative results may be obtained with a specified degree of confidence, is defined by the American Chemical Society (1983) as 190 ±30 at the 99 percent confidence level, where o is the standard deviation of the instrumental background noise.

c Concentrations that exceed human health-based protection or safety levels (Appendix E-3); contingent on approval by Ecology.

d No action level. Concentration determined for information only.

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are those known or suspected to be associated with the 300 ASE that were not excluded for reasons stated previously. These constituents comprise four categories of contaminants and specific constituents as listed in Table 3-2.

- 1. Solvents and organic compounds known to have been introduced to the 300 ASE.
- 27 Organic solvent degradation products not included in the first category.
- 3. Inorganic constituents from fuel element fabrication.
- 4. Inorganic constituents from other materials known or suspected to have been introduced into the 300 ASE (e.g., associated with paint shop solvents) that are potentially dangerous wastes (e.g., WAC-173-303-9905).

Concrete samples will be analyzed for the same constituents as soil samples (Table 3-2). The action levels for the 300 ASE solvent waste species in constituent categories (1) and (2) identified in Table 3-2 are the primary concrete performance standards for several reasons that are discussed in Appendix E-1.2.2. The main reasons are that very small amounts of inorganic constituents, if any, would have accompanied spills or leaks from the 300 ASE, and also because it would not be possible to discriminate very small amounts of 300 ASE-derived inorganic contamination from those attributable to past practice operations. Thus, inorganic constituents in the 333 East Concrete Pad will be handled in conjunction with the 300-FF-2 Operable Unit remedial actions. Ecology's final decisions regarding the closure of the 300 ASE, however, will be made on the basis of all data.

Clean closure is to be predicated on the premise that the constituents from the 300 ASE are not present in the soil or concrete in the closure area; or if present, are at concentrations statistically below baseline threshold values, or are at concentrations protective of human health and the environment. These performance standards are referred to here as action levels. The action levels are identified in Table 3-2 and are described in Section E-1.4 of Appendix E. The decision tree illustrated in Figure 3-1 describes the closure options to be followed. If the concentration of any of the constituents identified in Table 3-2 are statistically above the initial action levels, continued efforts to clean close the facility will be based on the type and extent to which an action level is exceeded and on further assessment of future activities necessary to protect human health and the environment. These assessments include evaluations of health-based risk using data from sources such as the EPA Integrated Risk Information System [IRIS (EPA 1991)], the Health Effects Assessment-summary tables (EPA 1989). The DOE-RL will request approval for the use of alternative action levels from Ecology's for closure of the 300 ASE, where warranted. If clean closure conditions cannot be met, closure will be performed in conjunction with Operable Unit 300-FF-2 as identified in Section 3.4 (Figure 3-1).

Initial action levels for both organic and inorganic constituents in soil—will be based on statistical variation from baseline values as described in Appendix E. Baseline values for soil in the case of the 300 ASE will be obtained from analyses of the soil covering the underlying 618-1 Burial Ground, excluding the closure area and areas of known disturbances.

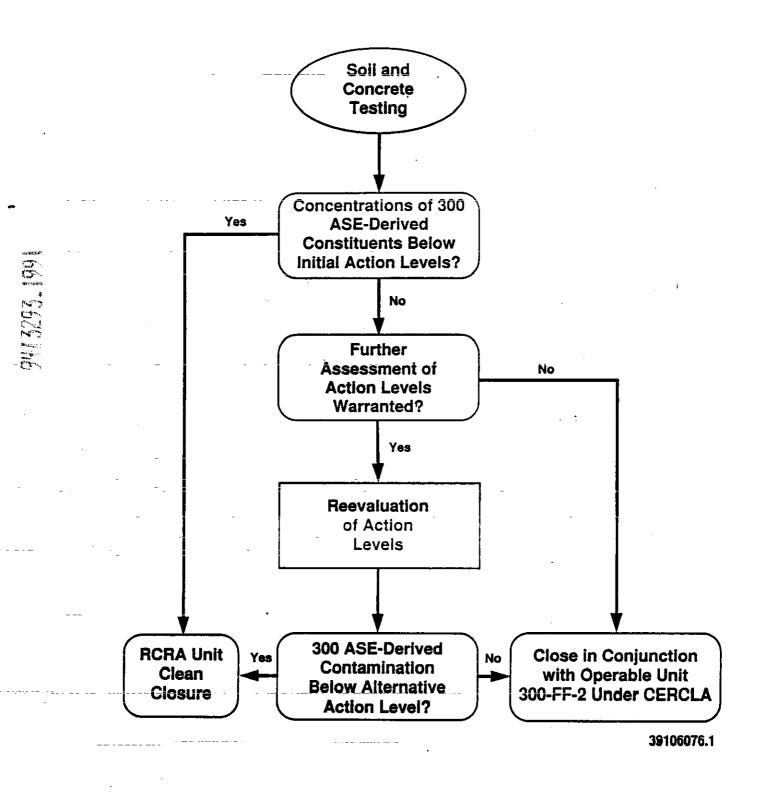


Figure 3-1. Decision Tree for Closure Options.

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Alternative action levels will be based on health-based limits (Appendix E-1.4). Closure of the 300 ASE should be based primarily on the concentrations of organic constituents listed in Table 3-2 because they are the only reliable indicators of 300 ASE derived contamination. However, all .5|_ data will be reviewed by Ecology in the decision process.

As described in Appendix E, a total of 15 soil samples will be taken: six samples and one duplicate from the 300 ASE soil closure area (Figure 3-2), and eight baseline samples from the 618-1 Burial Ground cover (see Figure 3-3). A total of 14 concrete samples (including one duplicate) from the concrete closure area will be collected from five concrete core sampling sites as shown in Figure 3-4 and described in Appendix E.

-----14 --- ---If-concentrations of the components identified in Table 3-2 are not 15 - statistically above these action levels, it will be concluded that no contamination from the 300 ASE exists or remains in the soil or concrete. The 300 ASE will be considered clean closed under RCRA and WAC-173-303, upon Ecology's acceptance of the results and evaluation of the soil and concrete sampling and analysis plan.

The presence of organic constituents in the soil (closure area and baseline), other than those listed in Table 3-2, will be regarded as originating from the underlying 618-1 Burial Ground or other operations in the 300 Area. Elevated concentrations of inorganic constituents in baseline samples will be interpreted in the same manner. Any remedial action for such contaminants will be evaluated in conjunction with the Remedial Investigation/Feasibility Study of Operable Unit 300-FF-2.

29 In the event that clean closure is not possible, the facility will be subjected to remediation in conjunction with CERCLA, whereby remediation will be evaluated as part of the Remedial Investigation/Feasibility Study of Operable Unit 300-FF-2. This is proposed because the proximity of the .33 ...300 ASE site to the underlying 618-1 Burial Ground precludes other types of RCRA closure. If the decision is made to close in conjunction with CERCLA. details of any decontamination efforts that are necessary as part of the clean closure or Remedial Investigation/Feasibility Study efforts will be based on the results of soil and concrete sampling and analyses and submitted as an amendment to the closure plan.

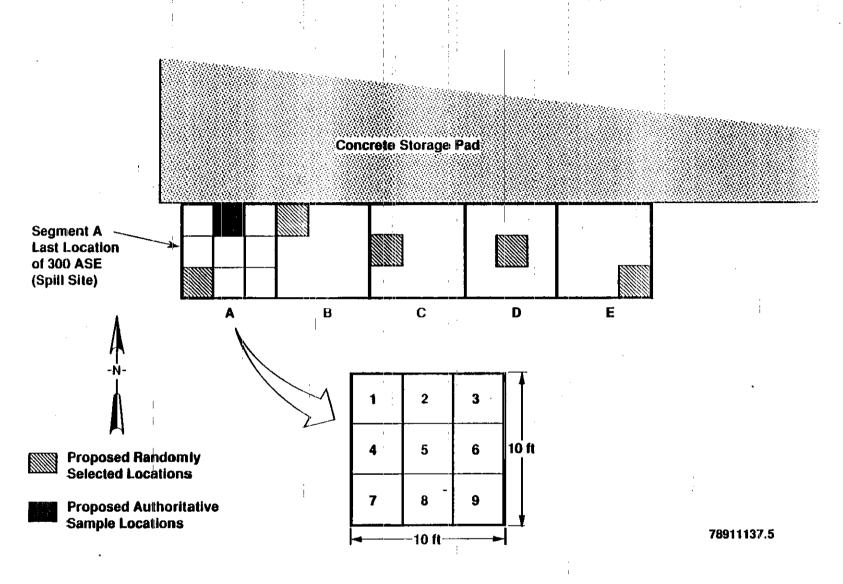
3.4 OTHER ACTIVITIES REQUIRED FOR CLOSURE

If no soil or concrete contamination is found, no additional activities are required. If clean closure is not possible, further closure activities will be performed in conjunction with the Operable Unit 300-FF-2 remedial action.

3.5 SCHEDULE FOR CLOSURE

Upon approval of this plan, schedules for sampling and analysis of _52 _soils_and_concrete_will be finalized. Table 3-3 is the sampling duration





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Figure 3-2. Soil Sampling Sites for the 300 Area Solvent Evaporator.

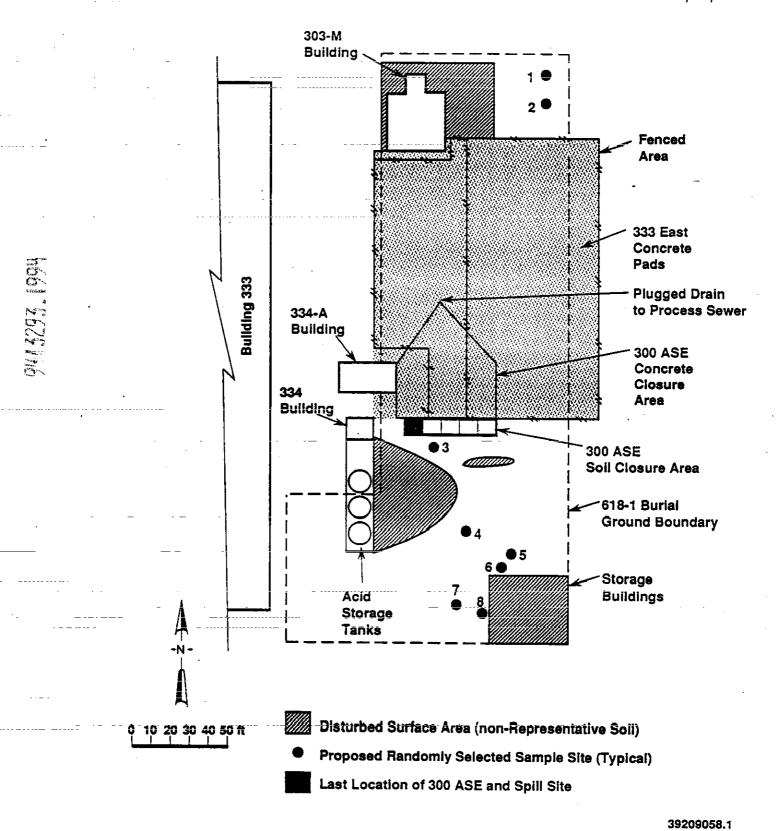
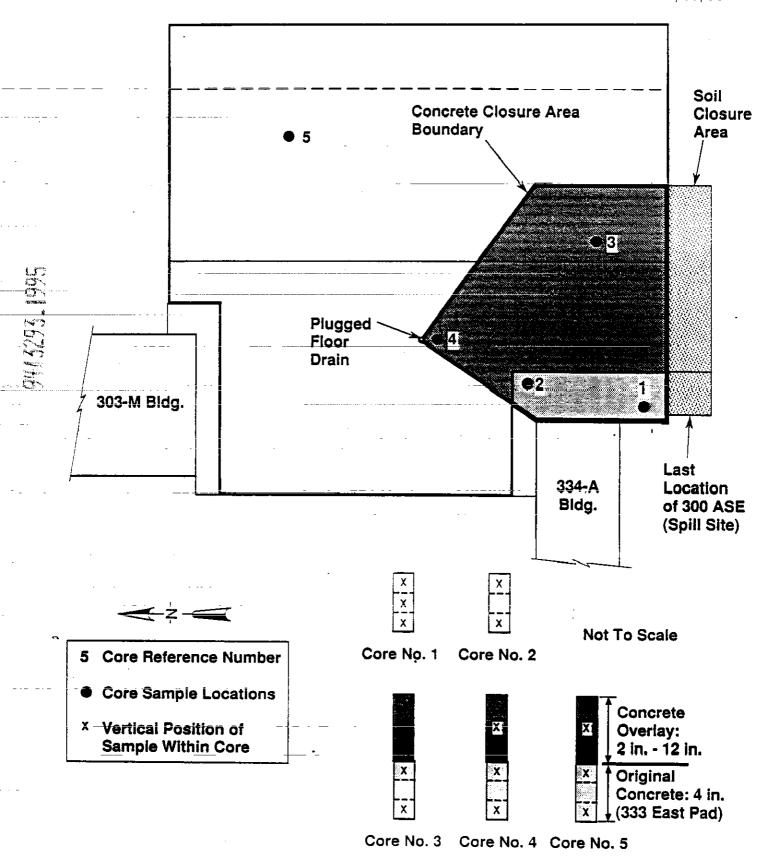


Figure 3-3. Baseline Soil Sampling Sites for the 300 Area Solvent Evaporator.



79001095.6 Figure 3-4. Concrete Sampling Sites for the 300 Area Solvent Evaporator.

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Table 3-3. Duration Schedule for Soil and Concrete Samplinga.

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|------------------|--------------------|--|
| 3 | Week | Activity |
| 4 | Ô | Receipt of Ecology's written authorization to perform sampling |
| 5 - | 1-6 | Mobilization_for_sampling; deployment of field crews, implementation of analytical laboratory's statement of work, engage independentengineer_contract, etc. |
| 6 | 7-8 | Collect and transport samples from the 300 ASE and baseline locations to the laboratory |
| 7 | 9-19 | Laboratory analysis of the samples (60 days) and verification of the laboratory report (21 days) |
| 8 | 20-23 | Review of analytical results and statistical analyses; telephone notification to Ecology (following the DOE-RL briefing) |
| 9 | 24-28 ^b | Submittal to Ecology of the closure disposition and contaminant volumes (if any), based upon the soil and concrete sampling/analysis results |
| 10 11 12 | a Soil | l and concrete sampling and analysis may not be concurrent logy/EPA acceptance of the closure disposition will constitute |

conclusion of the closure activities. schedule. It is anticipated that initiation of sampling and analysis and 17 closure of the site, will be completed within 180 days after approval of the

closure plan. Schedules for remedial action as part of the clean closure

activities, or as part of the Remedial Investigation/Feasibility Study

activities associated with Operable Unit 300-FF-2, will be provided to Ecology as amendments to this plan.

-24---3.6 AMENDMENT OF PLAN

The original closure plan for the 300 ASE was submitted to Ecology in September 1985. This version of the closure plan has been revised to reflect the completion of the stated initial closure activities and notification to the regulating authority of the current site status. Amendment(s) to this plan regarding the results of soil and concrete sampling and analysis and impacts to the clean closure strategy will be provided to Ecology.

Amendment(s) to this plan may also be provided in the event that any CERCLA remediation activities are necessary. The DOE-RL will be responsible for all amendments to this plan.

-3.7- CLOSURE HISTORY

Closure of the 300 ASE site began with suspension of solvent waste deliveries to the site in August 1985, and termination of the heating process and final shutdown of the facility in November 1985 (Table 3-1).

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3.8 SCHEDULE FOR TREATMENT, REMOVAL, AND DISPOSAL OF FINAL WASTE VOLUME

Removal, solidification, and disposal of the final waste volume was initiated in November 1985, and completed in July 1986. The schedule of these activities has been summarized in Table 3-1. Following the evaluation of data obtained from the soil and concrete sampling and analysis plan, if needed, as part of the CERCLA process, a schedule for removal and disposal of any 10 evaporator originated contaminants remaining in the soil and/or concrete will be prepared and provided to Ecology as an amendment to this plan.

CLOSURE COMPLETION AND EXTENSION OF 3.9 TIME PERIOD

It is required that final closure be completed within 180 days after receipt of the final volume of waste, or within 180 days after approval of the 19 - closure plan, whichever is later, unless an extension is granted. It is 20 anticipated that the soil and concrete sampling/verification activities will be completed within 180 days after approval of this closure plan. If the evolution of unforeseen events could necessitate an extension of this time period, then an extension from Ecology would be requested.

---4.0 CERTIFICATION OF CLOSURE

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4 ---- Within 60 days of final closure of the 300 ASE, the DOE-RL will submit to Ecology a certification of closure. This certification will be signed by both ___6 the DOE-RL and an independent professional engineer registered in the State of Washington, stating that the facility has been closed in accordance with the approved closure plan. The certification will be submitted by registered mail. Documentation supporting the closure certification will be retained and furnished to Ecology upon request. The DOE-RL will self-certify with the following document or a document similar to it:

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"I, the undersigned, the owner and operator of the 300 Area Solvent Evaporator, hereby certify that I have reviewed the approved 300 Area Solvent Evaporator Closure Plan and, to the best of my information and belief, all closure activities were performed in accordance with the specifications identified in the approved closure plan. (Signature and date)."

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Professional Engineer Closure Certification: The DOE-RL will engage an independent professional engineer registered in the State of Washington to certify that the facility has been closed in accordance with the approved closure plan. The DOE-RL will require the engineer to sign the following document or a document similar to it:

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hereby certify that I have reviewed the approved Closure Plan for the 300 Area Solvent Evaporator and, to the best of my information and belief, all closure activities were performed in accordance with the specifications identified in the approved closure plan, (Signature, date, professional engineer-license number, business address, and telephone number)."

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5.0 POST-CLOSURE

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5.1 NOTICE IN DEED

If clean closure cannot be accomplished, within 60 days of the certification of closure of the 300 ASE site, the DOE-RL will, in accordance with the state regulations, sign, notarize, and file for recording, the following notice. The notice will be sent to the Auditor of Benton County, P.O. Box 470, Prosser, Washington, with instructions to record this notice in the General Index. This document is normally reviewed in property title searches.

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TO WHOM IT MAY CONCERN

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> The U.S. Department of Energy-Richland Operations Office, an operations office of the U.S. Department of Energy, which is a department of the United States Government, the undersigned, whose local address is the Federal Building, 825 Jadwin Avenue, Richland, Washington, hereby gives the following -notice as required by 40 CFR 265.119(b) and WAC 173-303-610(10) whichever is applicable:

(a) The United States of America is, and since April 1943, has been in 25 possession in fee simple of the following described lands (legal description of the 300 ASE closure site).

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(b) The U.S. Department of Energy-Richland Operations Office, by operation of the 300 Area Solvent Evaporator, has disposed of hazardous and/or dangerous waste under the terms of regulations promulgated by the U.S. Environmental Protection Agency and Washington State Department of Ecology (whichever is applicable) at the above described land.

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(c) The future use of the above-described land is restricted under terms of 40-GFR-264.117(c)-and-WAC 173-303-610(7)(d) (whichever is applicable).

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Any and al! future purchasers of the this land should inform themselves of the requirements of the regulations and ascertain the amount and nature of wastes disposed on the above-described property.

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44 --- (e) -- The U.S. Department of Energy-Richland Operations Office has 45 ---- filed a survey plat with the Benton-County-Planning Department and with the U.S. Environmental Protection Agency Region 10 and Washington State Department of Ecology (whichever are applicable) showing the location and dimensions of the 300 Area Solvent ----Evaporator site and a record of the type, location, and quantity of waste treated.

It is DOE-RL's understanding that federal facilities are not required to comply with WAC 173-303-620. However, projections of anticipated closure costs will be provided annually during the closure activities (starting October 1993).

6.0 PROCEDURES TO PREVENT HAZARDS

The procedures applicable to normal Hanford Site activities (including soil and concrete-sampling) are described in the following sections.

6.1 SECURITY

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Security is addressed in Chapter 1.0, Section 1.2.

6.2 INSPECTION SCHEDULE

Clean closure is anticipated; therefore, this section is not applicable -16 -- to the 300-ASE:-...The alternative; if implemented, is to follow the CERCLA 17 process (300-FF-2 Operable Unit) and the emergency remedial action may be an epoxy-asphalt cover with suitable engineered thickness to preclude any RCRA _monitoring/inspection requirements.

6.3 DOCUMENTATION OF PREPAREDNESS AND PREVENTION REQUIREMENTS OR WAIVER

The Hanford Site normal emergency facilities/equipment are adequate for all emergencies, if needed. Figure 1-2 shows the close proximity of medical and fire station facilities. Section 6.5 addresses the relevant scenarios associated with closure activities and includes documentation requirements.

6.4 PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT

No closure activities are anticipated beyond the collection of soil and concrete samples; therefore, this section is not applicable to the 300 ASE.

6.5 SPILLS AND DISCHARGES TO THE ENVIRONMENT :

Because the facility no longer exists, there is no possibility of spills and discharges to the environment resulting from the 300 ASE. The only other types of impact to the environment from the 300 ASE are those associated with soil and concrete sampling activities, and there are no dangerous materials used in this effort. The following information is provided as an additional safety measure to cover unanticipated contingencies. The field team leader will be the responsible individual for modifying and implementing any additional safety measures.

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6.5.1 Notifications

<u>Three types of notifications are described in this section:</u> (1)-emergency-signals,-(2)-notification of emergency response organizations. and (3) notification of authorities.

6.5.1.1 Emergency Signals. Several communication systems exist on the Hanford Site to notify personnel of emergency incidents and to disseminate -information about events affecting Hanford Site activities. Three of these systems are as follows:

- Priority message system (management bulletin) = a network of telefax machines used to transmit important messages rapidly across the Hanford Site
- The DOE-RL radio system--links the Hanford Patrol, Hanford Fire Department, safety, and engineering representatives at a network of base stations, mobile units, and portable radios
- Hanford Site emergency signals--emergency signals used to alert personnel in an emergency event are listed in Table 6-1.

Table 6-1. Hanford Site Emergency Signals.

| Signal | Incident/Alarm Type | Response |
|---------------|---------------------------|---|
| Gong or bell | Fire | Nonprocess personnel will evacuate Process personnel will wait for directions |
| Steady siren | Evacuation | Get car keys if time permits and vacate building; report to staging area |
| Wailing siren | Take cover | Seek shelter indoors Shut windows and doors Await instructions |
| Ringing bell | CAM ^b alarm | Evacuate immediate area Call for help Remain in one location |
| CRASH-alarm | -Emergency-communications | Pick up phone and listen Relay message to building emergency director |

Area where facility personnel gather following notification of incident. Continuous air monitor.

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6.5.1.2 Notification of Emergency Response Organizations. The building emergency director will be responsible for initially assessing any facility emergency situation. Notification of the Hanford Site emergency response organizations will be carried out as follows.

- If the situation requires assistance from the Hanford Fire Department. ambulance, or the Hanford Patrol, notification of the Patrol Operations Center will be made via the Hanford emergency response number (811).
- For lesser emergencies necessitating assistance from outside the facility (but not requiring fire, ambulance, or patrol personnel) --- notification will be given to the emergency duty officer at the Patrol Operations- Center business number (373-3800).
 - In the case of a relatively minor abnormal occurrence, the situation will be handled by facility personnel (the building emergency director and line management).
 - 6.5.1.3 Notification of Authorities. Notification of the DOE-RL, Ecology, and the National Response Center will be carried out as follows.
 - The building emergency director or line management will document all emergencies on an Event Fact Sheet (Figure 6-1), which must be completed within 24 hours. The Event Fact Sheet will be used to provide Westinghouse Hanford management with facts about an unplanned event and to disseminate information to those responsible for preventing recurrence of similar events. The DOE-RL will be notified by Westinghouse Hanford line management or the assigned overview organization depending on the consequences of the event. A copy of the Event Fact Sheet will be retained by the DOE/RL.
 - The Patrol Operations Center will immediately notify the DOE-RL of all emergency incidents (fires, explosions, releases, etc.) reported via the Hanford Site emergency number (811).
 - In the case of any release of dangerous waste, the building emergency director will immediately notify Westinghouse Hanford Environmental Protection. All releases of dangerous waste to the environment will be reported immediately to the DOE-RL by Environmental Protection. The DOE-RL then will notify Ecology of the release.
 - In addition, if a spill exceeds the reportable quantities established under CERCLA, according to 40 CFR 302, the DOE-RL will notify the National Response Center at (800) 424-8802.
 - The DOE-RL report to Ecology and the National Response Center will contain the following information:
 - Name and telephone number of reporter
 - Name and address of facility
 - Time and type of incident

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- Name and quantity of material(s) involved to the extent known
- Extent of injuries, if any
- Possible hazards to human health and the environment outside the facility
 - Actions taken to mitigate the situation.
- All environmental releases of hazardous materials, including those that do not exceed a CERCLA or Ecology reporting limit, will be included in a monthly spill report. Facility managers provide information on environmental hazardous material spills to Environmental Protection. Environmental Protection compiles the monthly spill report for submittal to DOE-RL.
- All spills or releases that occur during transportation will be reported by the transporter to the DOE-RL and Ecology. In addition, a written report will be submitted to:

Director, Office of Hazardous Material Regulations
Materials Transport Bureau
Department of Transportation
Washington, DC 20990.

6.5.2 Mitigation and Control

Any waste remediation will be addressed as part of the 300-FF-2 Operable Unit, therefore, this section does not apply.

| | Contractor: | EVENT FACT SHEET | Page 1 of |
|----------------|--|--|-------------|
| | 1. Title 2. Reporting Organization 3. Division/Department/Project | 5. Rev | vent/Time / |
| | 7. <u>Event Identification</u> A) Location of Event: E) Plant/facility Status: | | - |
| 137 | 8. Apparent Cause(s) of Event | ☐ Design ☐ Material ☐ Personnel Error ☐ Administrative Control | ☐ Procedure |
| 346.52.95.2005 | 9. <u>Description of Event</u> | | |
| | 10. <u>Consequences of Event</u> | | • |
| | | • | |
| | 11. <u>Actions Taken (A) or Manned (8)</u> | | • |
| | | | |
| | 12. <u>Tentative Oisposition</u> ——————————————————————————————————— | 13. <u>Signatures</u> | - |
| | Event meets criteria for a Critique Undetermined: Revised EFS will be issued in 3 working days Above criteria not met: no further report | Approved Date Approved Date ACCUCHI Review Official | Ar Sale |
| | | | |

Figure 6-1. Event Fact Sheet.

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7.0 CONTINGENCY PLAN

The 300 ASE sampling plan and the <code>Environmental Investigations</code> and <code>Site Characterization Manual</code> (WHC 1989) contain contingency plan information for specific field sampling operations.

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8.0 PERSONNEL TRAINING

All personnel involved with the closure activities of the 300-ASE will receive a minimum level of dangerous waste training.

- Managers and supervisors (M & S) are responsible for supervising, coordinating, and directing the closure activities and personnel.
- Nuclear Process Operators and Decommissioning and Decontamination
 — workers (NPO) are responsible for sampling, packaging, and handling of
 _ dangerous waste, nonradioactive, and radioactive material.
- Health Physics Technicians (HPT) are responsible for surveying for radiological and dangerous waste contamination.
- Crafts (CR) personnel are responsible for specialized work. The various crafts include carpenters, electricians, ironworkers/riggers, heavy equipment operators, crane operators, millwrights, pipefitters, and painters.

In addition to the personnel mentioned, any person entering a TSD unit during closure must have the 40 hour hazardous workers training.

Table 8-1 contains a matrix that relates job categories to the individual training course. Appendix N contains brief descriptions of the training courses, including descriptions of the target audience, instructional technique, evaluation method, length of course, and frequency of retraining.

| Table | 8-1. | Company-General | Training | Matrix. |
|-------|------|-----------------|----------|---------|
|-------|------|-----------------|----------|---------|

| Course title | 1 | Target/Audience | | | |
|---|------|-----------------|-----|-----|-----|
| course tritle | Type | MS | NPO | HPT | CR |
| Generator Hazards Safety Training | I | X | х | X | X |
| Hazardous Waste Worker Safety Training | I | х | Х | х | X |
| Hazardous Waste Worker Safety Training, Refresher | C | X | Х | Х | Х |
| Hazardous Materials/Waste Job Specific Training | I I | _ X | X | X | Х |
| Scott SKAPAK' MSA PAPR | | X | Х | x | Х |
| Self-Contained Breathing Apparatus (SCBA) Training (optional) | С | х | х | X | Х |
| Radiation Safety Training | c | Х. | Х | X_ | . х |
| On-the-Job Training | С | × | × | х : | X |
| Cardiopulmonary Resuscitation | С | X | x | · x | X |
| Noise Control (optional) | l c | X | X | × | X |

C = continuing course.

I = introductory course.

X = required course.

| | 1 | Title: | Generator Hazards Safety Training |
|--------|--------|-------------------|---|
| | 2 | Description: | Provides—the dangerous material/waste worker with the fundamentals for safe use and disposal of dangerous materials. |
| | 3 | Target Audience: | Dangerous material and waste workers |
| | 4 | Technique: | Classroom |
| | 5 | Evaluation: | Written test |
| | 6 | Length: | 4 hours |
| | 7 | Frequency: | 24 months |
| | 8 | | |
| | 9 | | |
| - 18 P | 10 | Title: | Hazardous Waste Worker Safety Training |
| | 11 | -Description: | Provides the dangerous waste worker with the fundamentals of safety when working with dangerous waste. |
| | 12 | | Note: This course fulfills training requirements of 29 CFR 1910.120 requiring dangerous waste training of workers at all treatment, storage, and/or disposal facilities regulated under RCRA. |
| | 13 - | -Target-Audience: | -Dangerous-material-and-waste-workers |
| | 14 | Technique: | Classroom and on-the-job training |
| | 15 | Evaluation: | Written test |
| | 16 | Length: | 24 hours |
| | 17 | Frequency: | Not applicable |
| | 18 | | |
| | | | |

| | 1 | Title: | Hazardous Waste Worker Safety Training Refresher |
|--|--------------|------------------|---|
| | 2 - - | -Description: | Provides the dangerous waste worker with a refresher in the fundamentals of safety when working with dangerous waste. |
| | 3 | | Note: This course fulfills training requirements of 29 CFR-1910.120 requiring dangerous waste training of workers at all treatment, storage, |
| : : <u>.</u> | - | | training of workers at all treatment, storage, and/or disposal facilities regulated under RCRA. |
| | 4 | Target Audience: | Dangerous material and waste workers |
| | 5 | Technique: | Classroom |
| | 6 , | Evaluation: | Written test |
| | 7 | Length: | 8 hours |
| | 8 | Frequency: | 12 months |
| Application of the second of t | 9 | | • |
| | 10 | | |
| | 11- | -Title: | Hazardous Material/Waste Job-Specific Training |
| | | | Provides job-specific dangerous material/waste information. Two checklists may be obtained from safety training to halp the supervisor/manager through this session with each employee. |
| | 13 | | Note: Not a classroom presentationsupervisor conducts this exercise with each employee using the checklists. |
| | -14 | Target Audience: | Employees who complete generator hazards safety training |
| | 15 | Technique: | On-the-job training |
| - | -16 | Evaluation: | On-the-job training checklist |
| | 17 | Length: | Average - 2 hours |
| | | _ | |
| - | 18 | Frequency: | 12 months |

| 1 | Title: | Scott SKAPAK MSA PAPR |
|----------------------------|--|--|
| 2 | Description: | This class is designed to instruct employees in the proper use of the Scott "SKAPAK" for entry, exit or work in conditions immediately dangerous to life and health and to instruct employees to recognize and handle emergencies. This class also includes instructions in the use of MSA PAPR. |
| 3 | Target Audience: | General, Safety, QA, OPS/OPRS, Management, Maintenance Engineering |
| 4 | Technique: | Classroom |
| 5 | Evaluation: | Practical exam |
| 6 | Length: | -Approximately-2 hours |
| 7 | Frequency: | 12 months |
| 8 | | |
| ^ | | |
| 9 | | |
| 10 | Title: | Self-Contained Breathing Apparatus (SCBA) Annual Qualification |
| | | |
| 10 | | Provides instructions in the proper use of a pressure-demand respirator in which breathing air is supplied from a cylinder carried on the user's back. The SCBA are typically used for emergency response situations in an atmosphere that is |
| 10 | Description: | Provides instructions in the proper use of a pressure-demand respirator in which breathing air is supplied from a cylinder carried on the user's back. The SCBA are typically used for emergency response situations in an atmosphere that is immediately dangerous to life or health. |
| 10 | Description: Target Audience: | Provides_instructions_in_the proper use of a pressure-demand respirator in which breathing air is supplied from a cylinder carried on the user's back. The SCBA are typically used for emergency response situations in an atmosphere that is immediately dangerous to life or health. General, Safety, OPS/OPRS, Maintenance Taught in a classroom using a slide projector and |
| 10 11 12 13 | Description: Target Audience: Technique: | Provides instructions in the proper use of a pressure-demand respirator in which breathing air is supplied from a cylinder carried on the user's back. The SCBA are typically used for emergency response situations in an atmosphere that is immediately dangerous to life or health. General, Safety, OPS/OPRS, Maintenance Taught in a classroom using a slide projector and overhead |

| | 1 | Title: | Radiation Safety Training |
|-----|--------------------------------|---|---|
| | 2 | Description: | A practical dress/undress demonstration is also required. Instructs radiation workers in the fundamentals of radiation protection and the proper procedures for monitoring exposures (ALARA). Training includes knowledge of the acute and chronic effects of exposure to radiation risks associated with occupational radiation exposure, mode of exposure, protective measures, instrumentation, monitoring programs, contamination control, personnel decontamination, warning signs and alarms, and responsibilities of employees and managers. |
| SEE | 3 | Target Audience: | Radiation workers as defined in WHC-CM-4-10 |
| | 4 | Technique: | Taught in a classroom using a white board, appropriate audio/visual equipment |
| | 5 | Evaluation: | Written exam and practical dress/undress |
| 7 | 6 | Length: | Approximately 7 hours |
| | 7 | Emparionava | 24 months (Datumining under Course Number 020002) |
| - | . 7 | Frequency: | 24 months (Retraining under Course Number 020003) |
| - | 8 | rrequency: | 24 monins (Retraining under Course Number 020003) |
| - | • | rrequency: | 24 monins (Retraining under Course Number 020003) |
| - | 8 | Title: | On-The-Job Training |
| | 8 9 | | |
| | 8 9 10 11 | Title: Description: | On-The-Job Training On-the-job training session under the supervision of an experienced person before full -responsibilities may be assumed. In addition, all personnel on the hazardous waste site are required to have reviewed this Waste Sampling and Analysis |
| | 8 9 10 11 | Title: Description: Target Audience: | On-The-Job Training On-the-job training session under the supervision of an experienced person before full -responsibilities may be assumed. In addition, all personnel on the hazardous waste site are required to have reviewed this Waste Sampling and Analysis Plan. |
| | 8 9 10 11 12 | Title: Description: Target Audience: Technique: | On-The-Job Training On-the-job training session under the supervision of an experienced person before full -responsibilities may be assumed. In addition, all personnel on the hazardous waste site are required to have reviewed this Waste Sampling and Analysis Plan. Dangerous Material and Waste Workers |
| | 8 9 10 11 12 13 | Title: Description: Target Audience: Technique: Evaluation: | On-The-Job Training On-the-job training session under the supervision of an experienced person before full responsibilities may be assumed. In addition, all personnel on the hazardous waste site are required to have reviewed this Waste Sampling and Analysis Plan. Dangerous Material and Waste Workers Classroom and on-the-job training Practical exercise and on-the-job training |

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Cardiopulmonary Resuscitation (CPR)

2 Description: Provide cardiopulmonary Resuscitation training to

the American Heart Association standards.

3 Target Audience: All employees

4 Technique: Classroom and active participation.

Evaluation:

Practical exam and written test.

6 Length:

4 hours

7 Frequency: 24 months (recertification)

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Title:

Noise Control (Noise-Hearing Conservation)

11 Description: Provide employees with information conducive to

hearing conservation. Supervisors and employees

responsibility, exposure limits, hearing

conservation requirements, protection devices,

diagnosis of noise, induced hearing loss.

12. Target Audience: All employees exposed to an 8 hour time weighted

average sound level of 85 dBA or greater.

13 Technique:

Classroom

14 Evaluation: None

15 Length:

Approximately I hour

16 Frequency: 12 months

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9.0 OTHER RELEVANT LAWS

As discussed in Sections 3.3 and 3.5, the CERCLA process could become 5 -significant-in remediating this RCRA-site. Applicable RCRA requirements will be included within the CERCLA processes, if clean closure is not possible.

This section provides a summary of the regulatory review performed to assist Ecology in determining that the 300 ASE has met its obligations with respect to other federal or state laws. The major environmental laws evaluated include the following:

- The Clean Air Act of 1977, as amended
- The Clean Water Act of 1977, as amended
- The Coastal Zone Management Act of 1972, as amended
- The Endangered Species Act of 1973, as amended
- The Fish and Wildlife Coordination Act of 1934, as amended
- _ The National Historic Preservation Act of 1966, as amended
- The Wild and Scenic Rivers Act of 1968, as amended.

In addition, a summary of other requirements that may apply is provided. 22 -Full references for each of these acts are included in Chapter 10.0.

9.1 THE CLEAN AIR ACT OF 1977

No active processing will occur at the 300 ASE to provide routine emissions. No radioactive material will be stored at the facility. Storage will involve sealed dangerous waste with possibly some occasional sampling activities. Other than a catastrophic event, no upset conditions internal or external to the facility would result in release concentrations outside the facility exceeding levels the Occupational Safety and Health Administration <u>----33--40SHA) (OSHA 1989) defines as immediately dangerous to life and health.</u> Airborne releases from upset conditions would only continue until recovery actions were taken. Based on this scenario, airborne emissions from the 36 facility will not include contaminants at concentrations or in sufficient amounts that currently require an air quality permit from any agency.

40 9.2 THE CLEAN WATER ACT OF 1977

Because the 300 ASE no longer exists, operation of the 300 ASE can no longer result in the discharge of any liquid effluents that would require a - 44 - National Pollutant Discharge Elimination System (NPDES) permit; therefore, no permits or reviews pursuant to the Clean Water Act of 1977 are applicable.

9.3 THE COASTAL ZONE MANAGEMENT ACT OF 1972

- 50--- The 300 ASE site is not located in a coastal zone or shoreline area as -51 defined by this statute; therefore, no permits or reviews pursuant to the Coastal Zone Management Act of 1982 are applicable.

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9.4 THE ENDANGERED SPECIES ACT OF 1973

The site for the 300 ASE cannot be considered an undisturbed area or a major habitat for native plant and animal species. Also, this area constitutes a very small fraction of the Hanford Site and, hence, would not play a significant role in the ecology of the Hanford Site. No listed or proposed endangered or threatened species or their habitats are expected to be affected by 300 ASE activities.

THE FISH AND WILDLIFE COORDINATION 9.5 **ACT OF 1934**

The 300 ASE will not involve the impoundment, diversion, or other control or modification of any body of water; therefore, no permits or reviews pursuant to the Fish and Wildlife Coordination Act of 1934 are applicable.

9.6 THE NATIONAL HISTORIC PRESERVATION **ACT OF 1966**

The 300 ASE affects no areas that are eligible for nomination to the National Register of Historic Places. In addition, the area was reviewed for cultural resources.

Sites used as material 'borrow areas' for the 300 ASE have been reviewed for the presence of archaeological resources in accordance with regulations 28 issued pursuant to, or other requirements of, the *American Antiquities*-29 -- *Preservation Act of 1906*; the American Indian Religious Freedom Act of 1978; 30 - the Historic-Sites, Buildings and Antiquities Act of 1935; the Archaeological ----31---and-Historic Preservation Act of 1960; and the *Archaeological Resources* Protection Act of 1979. No known cultural resource impacts have occurred from 300 ASE activities.

9.7 THE WILD AND SCENIC RIVERS ACT OF 1968

The 300 ASE site does not affect any rivers presently designated under the Wild and Scenic Rivers Act of 1968.

9.8 OTHER REQUIREMENTS

The application of insecticides and herbicides on or in the immediate vicinity of the 300 ASE will be conducted in compliance with the Federal Insecticide, Fungicide, and Rodenticide Act of 1975, the Toxic Substances Control Act of 1976, and the applicable provisions of the Water Quality Standards for Surface Waters of the State of Washington (Ecology 1988).

10.0 REFERENCES

2 3

1

American Antiquities Preservation Act, 1906, 16 USC 432.

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American Chemical Society, 1983, Principles of Environmental Analysis, Analytical Chemistry, Vol. 55, pp. 2210-2218.y

9 10 11

American Indian Religious Freedom Act, 1978, Public Law 95-341, 92 Stat. 469, 42 USC 1996.

12 13 Archaeological Resources Protection Act of 1979, Public Law 96-95, 93 Stat. 721, 16 USC 470aa.

14 15

Clean Air Act of 1977, as amended, Public Law 95-95, 91 Stat. 685, 42 USC 7401.

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18 -- Clean Water-Act of 1977, as amended, Public Law 95-217, 92 Stat. 1566. 33 USC 1251.

19 20 21

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Coastal Zone Management Act of 1972, as amended, Public Law 92-583. 86 Stat. 1280, 16 USC 1451 et seq.

Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, Public Law 96-510, 94 Stat. 2767, 42 USC 9601 et seq.

26 27 28

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DOT, 1988, Shipping Container Specification, Title 49, Code of Federal Regulations, Part 178, U.S. Department of Transportation, Washington, D.C.

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Ecology, 1988, Water Quality Standards for Surface Water of the State of Washington, WAC 173-201, Washington State Department of Ecology, Olympia, Washington.

33 34 35

> 36 Ecology, 1989, Dangerous Waste Regulations, WAC 173-303, Washington State Department of Ecology, Olympia, Washington.

37 38 39

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Ecology, EPA, and DOE, 1989, Hanford Federal Facility Agreement and Consent Order, Washington State Department of Ecology, U.S. Environmental Protection Agency, U.S. Department of Energy, Olympia, Washington.

42 43 44

Endangered Species Act of 1973, as amended, Public Law 93-205, 87 Stat. --884: 16 USC 1531. et sea.

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-47---EPA, -1982, -RCRA (Resource Conservation and Recover Act) Guidance 48 Document: Landfill Design, Liner Systems and Final Cover. U.S. Environmental Protection Agency, Springfield, Virginia.

45.

- EPA, 1989, Environmental Protection Agency, Code of Federal Regulations, Title 40, Parts 1-399, as amended, U.S. Environmental Protection Agency, Washington, D.C.
- EPA, 1989a, Risk Assessment Guidance for Superfund: Human Health Evaluation Manual, Part A, Chapter 6, Exposure Assessment, U.S. Environemtal Protection Agency, Washington, D.C.
- EPA, 1989b, Health Effects Assessment Summary Tables, U.S. Environmental Protection Agency, Washington, D.C.
- EPA, 1991, Integrated Risk Information System (IRIS), U.S. Environmental Protection Agency, Washington, D.C.
- Federal Insecticide, Fungicide, and Rodenticide Act, 1975, as amended, Public Law 92-516, 86 Stat. 973, 7 USC 136 et seq.
- Fish and Wildlife Coordination Act of 1934, as amended, c. 55 S1, 8 Stat. 401, 16 USC 661.
- Historic Sites, Buildings and Antiquities Act of 1935, 49 Stat. 666, 16 USC 461-467.
- National Historic Preservation Act of 1966, as amended, Public Law 89-665, 80 Stat. 915-919, 16 USC 470 et seq.
- OSHA, 1989, Hazardous Waste Operations and Emergency Response, Title 29 Code of Federal Regulations, Part 1910.120, as amended, Federal Register, 54 FR 12792, March 28, 1989, Occupational Safety and Heath Administration, Washington, DC.
- RTECS, 1987, Registry of Toxic Effects of Chemical Substances 1985-86 Edition Users Guide, as amended, U.S. Department of Health and Human Services, National Institute for Occupational Safety and Health, Washington, D.C.
- Resource Conservation and Recovery Act of 1976, as amended, Public Law 94-580, 90 Stat. 2795, 42 USC 6901 et seq.
- Sax, N.I. and Lewis, R.J., 1987, Hawley's Condensed Chemical Dictionary, 11th ed., Van Nostrand Reinhold Company, New York, p. 806.
- Toxic Substances Control Act of 1976, Public Law 94-469, 90 Stat. 2003, 15 USC 2601 et seq.
- WHC, 1989, Environmental Investigation-and-Site-Characterization Manual (EII), WHC-CM-7-7, Westinghouse Hanford Company, Richland, Washington.
- 49 Wild and Scenic Rivers Act of 1968, as amended, Public Law 90-542, 82
 50 Stat. 906, 16 USC 1271.

| 1 2 | | APPENDIX TABLE OF CONTENTS | |
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| 3 4 | Α. | Part A Application | A -i |
| 5 6 | В. | Hanford Site Waste Information Data System | B-i |
| 8 | C·. | Composition and Designation of the Solvent Evaporator Waste | C-i |
| 10 11 12 | D. | Procedures, Work Authorizations, Burial Records, and Compliance Checksheets | D-i |
| 13 14 15 | Ε. | Soil and Concrete Sampling and Analysis Plan for the 300 Area Solvent Evaporator | E-i |
| | - - F | Air Quality Monitoring Records at the Solvent Evaporator | F-i |

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APPENDIX A

- PART A APPLICATION

| 1 | CONTENTS | |
|---------|------------------------------------|----------|
| 3 | | |
| 4 | Part A Form 1 | 3 Pages |
| -5 6 | Part A Form 3 (includes 3 figures) | 10 Pages |

FORM State of Washington Department of Ecology

WASHINGTON STATE

L EPA/STATE LD. NUMBER

DANGEROUS WASTE PERMIT GENERAL INFORMATION

WIA 17 18 19 10 10 10 18 19 10 17

IL NAME OF FACILITY lu.'S. 'D'E'P'A'R'T'M'E'N'T' 0 F 'E'N'E'R'G'Y'- 'H'A'N'F'O'R D' S' I' T' E AL FACILITY CONTACT A. MARKE & TITLE DANK AVEL & WAN TL'A'W'R'E'N'C'E', MITCHA'E'L J... MANAGER 5 0 9 3 7 6 7 3 9 5 IV. FACILITY MAILING ADDRESS A. STREET OR P.O. BOX B 0 X 5 5 0 72.0. WAL RICHLAND 9 9 3 V. FACILITY LOCATION A. STREET, NOUTE NO. OR OTHER SPECIFIC DESITING ΤΈ THAN FORD BENTON C. COTY COLTCO I D. STATE ! E ZP COOL TRICHLAND 9 9 3 5 2 lo 'o 's IV. SIC CODES (4-digit, in order of priority) 4, 350000 "NUCLEAR NONCOMMERCIAL DEVELOPMENT 18 9 2 2 19 7 I I NATIONAL SECURITY AND EDUCATION D. POURTH ADMINISTRATION AND GENERAL STEAM-ELECTRIC GENERATION 796 1 1 4 9 1 1 FCONOMICS PROGRAM VII. OPERATOR INFORMATION $(D \cap F - R)$ DEPARTMENT OF WENERGY - RICHLAND OPERATIONS YES NO WESTINGHOUSE HANFORD COMPANY C. STATUS OF OPERATOR (Emer the a F - FRVATE M = FUTLIC (as 7 3 9 5 7 6 15 0 9 E STREET OR P.O. BOX 509 7803 ІРО ВОХ ีร ์ร ๋0 ๋ / ๋ ค ๋ 0 ่ B O X 1 9 7 0 F. CITY OR TOWN CL STATE | H. ZP CODE YIL INDIAN LAND RICHLAND W A 9 9 3 5 2 TE3 **△** №

***DOE-RE: OWNER/CO-OPERATOR; WHO: GO-OPERATOR FOR CERTAIN UNITS ON THE HANFORD SITE.

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IX MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, atorage, or disposed facilities, and each well where it injects fluids undergound. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

X NATURE OF BUSINESS (provide a brief description)

- O NATIONAL DEFENSE NUCLEAR MATERIAL PRODUCTION
- ENERGY RESEARCH AND TECHNOLOGY DEVELOPMENT
- DEFENSE NUCLEAR WASTE MANAGEMENT
- o BYPRODUCT STEAM, SOLD FOR ELECTRIC POWER GENERATION

AND SIC 15: BUILDING CONSTRUCTION - GENERAL CONTRACTORS AND OPERATIVE BUILDERS

XI. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, i believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

| ~ ~~~ | raman | THE PARTY SHARES |
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SEE ATTACHMENT

C. DATE STREET

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WA7890008967

FORM 1

DANGEROUS WASTE PERMIT GENERAL INFORMATION

XI. CERTIFICATION

I cartify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Michael J. Lawrence

Manager, Richland Operations

United States Department of Energy

5-/9-88 Date

William M. Jacobi

President

Westinghouse Hanford Company

Co-operator

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III. PROCESSES (continued)

T SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESS (code "TOA") FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

Tol. Sol - The 300 Area Solvent Evaporator was a treatment tank that was used to treat radioactively contaminated spent solvents. These solvents were generated in the fuel fabrication process at the 300 Area. The solvents consisted mainly of spent trichloroethylene, perchloroethylene, I,1,1-trichloroethane and an ethyl acetate-bromine solution. Non-radioactive paint shop solvents that were potentially treated include methyl ethyl ketone, methylene chloride and petroleum naphtha. Treatment of the wastes occurred by evaporation in a Brooks Load Lugger tank with steam coils located on the side of the tank (Tol). The unit was used to treat approximately 600 gallons of dangerous wastes per year. This unit has not received dangerous wastes since November 1985 and the site will be closed under interim status.

A portion of the open air concrete pad adjacent to the 334-A Building (333 East Pad) was used periodically for storage of the Solvent Evaporator and radioactively contaminated spent solvents in DOT-specification 55 gallon steel drums (SOI). The drums were temporarily stored on the concrete pad north-of the Solvent Evaporator sites until the waste solvents were placed in the Solvent Evaporator. No part of the overlying concrete that was placed above most of the 333 East Pad in 1984 was used for storage or treatment of the 300 Area Solvent Evaporator wastes.

V. DESCRIPTION OF DANGEROUS WASTES

- A. DANGEROUS WASTE NUMBER Enter the four digit number from Chapter 173-303 WAC for each listed dangerous waste you will handle. If you handle dangerous wastes which are not listed in Chapter 173-303 WAC, enter the four digit number(s) that describes the characteristics and/or the toxic contaminants of those dangerous wastes.
- E. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis.

 —For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste(a) that will be handled which posseds that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column 8 enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

| ENGLISH UNIT OF MEASURE | COL | E | METRIC UNIT OF MEASURE | - | COL |
|-------------------------|-----|---|------------------------|---|-----|
| POUNDS . | | 3 | KILOGRAMS | | |
| TOMS | | • | METRIC TONS | | |

If faculty records use any other unit of measure for quantity, the units of measure must be converted and one of the required units of measure taxing into account the appropriate generally or the weste.

D. PROCESSES

I._PROCESS CODES:

For Federal derivatives waster: For sech listed dangerous waste entered in column A select the cade(s) from the list of process cases cancelled in Section 61 to indicate new the waste will be stored, treated, and/or dispassed of at the fedsity.

For non-listed dangerous wastes: For each characteristic or foxio contaminant entered in Column A. select the code(s) from the list of process codes contamined in Section III to indicate all the processes that will be used to store, (rest, and/or dispose of all the non-listed dangerous wastes that possess that characteristic or toxic contaminant.

Mater: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "900" in the extreme right box of train

2 PROCESS DESCRIPTICA: If a code is not belied for a process that will be used. Geochide the process in the sease driving an the form.

MOTEL DANGEROUS WASTES DESCRIBED BY MORE THAN ONE DANGEROUS WASTE NUMBER --- Dangerous worsen inch can be described by more than one Waste Number shall be described on the form as informed.

- 1. Select one of the Campareus Waste Numbers and enter it in column A. On the same line columns 8, C, and 0 by esameting the total enters quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line error the other Dangertus Waste Number that can be used to describe the waste, is column CC2) on that line error "Indicate with above" and make no other entres on that line.
- 2. Assest stee 2 for each other Dangarous Weste Number that can be used to describe the dangarous waste,

EXAMPLE FOR COMPLETING SECTION IV (anower at one numbers X-1 X-2, X-1, and X-4 below) — A facility will treat and disease of an extracted SOD pausits per year of currents entering in the legister taking and timening personal. In addition, the takinty will treat and dispose of three non-money wester. The waster are destinate only and there will be an estimated 100 pausits per year of that waster. Treatment will be an addition, the takinty will be an estimated 100 pausits per year of that waster. Treatment will be an additional will be an addition.

| Ĺ | I | A. | | | * | C. UMF | I | D. PROCESSES | | | | | | | | | | | | |
|------------|---|------------------------|---|-----|--|-------------------------|---|------------------|--------|--------|-----|---------|-------------|---|---|---|---|---|---|---------------------|
| 4 0 1 N | | DANGEROUS WASTE NO. | | 10. | S. ESTIMATED AMULAL GUANTITY OF WASTE | SUPE (conce copes | | 1. PROCESS CODES | | | | | | | | | | | 2. PROCESS DESCRIPTION (d a gapty to the empire) in D(19) | |
| X-1 | | K | U | 3 | 4 | 900 | P | 7 | 0 | ; | , , | ָ כ | 9 (| 9 | - | 1 | | ī | 1 | |
| ٧.2 | | D | n | 0 |]: | 400 | P | 7 | 0 | ī | | , כי | ا ک لا |) | 1 | ì | | T | T | |
| X-3 | | ם | o | 0 | 1 | 100 | ρ | 7 | ا ن | | 1 |) | - 1 1. / | , | 1 | 1 | | ì | Ţ | |
| ۲ - | | D | U | 0 | 2 | | | 7 | · | T ; | 1 |) | ן ל | , | T | ī | İ | Ī | i . | included with above |

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HA 7 8 9 0 0 0 0 8 9 6 7 DESCRIPTION OF DANGEROUS WASTES (continued) D. PROCESSES H O E . & ESTIMATED ANNUAL QUANTITY OF WASTE PROCESS CODES 2. PROCESS DESCRIPTION WASTE NO. Evaporation/Container Storage 7700 Þ 2 F 0 0 2 3 Flolo 4 F 0 0 5 5 W P 0 1 0 1 7 W T 0 1 Included With Above 0001 9 10 11 12 13 15 16 17 18 19 20 21 22 23 24 26

ECY 030-31 Form 3

10.30 37 to

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| ! IV. DESCRIPTION OF DANGEROUS WASTES (communed) | |
|--|---|
| | |
| E USE THE SPACE TO LIST ADDITIONAL PROCESS CODES PROM SECTION D(1) ON PAGE 1. | |
| The 300 Area Solvent Evaporator was used for the treatment of contaminated solvents generated during the fuel fabrication ef processes. Approximately 7700 pounds of waste were treated in each year. | forts and associated |
| The storage pad was used to temporarily store radioactively compared until the solvent could be treated in the Solvent Evapor | ntaminated solvent ator. |
| | |
| | |
| Ç | |
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| | |
| V. FACILITY DRAWING | y mare esteal. |
| VI. PHOTOGRAPHS | |
| All country legitines right representations (noted or process where the executy technique of country streets of the country technique of country of the coun | making starting, Physician and Georges orthog and |
| VIC FACILITY GEOGRAPHIC LOCATION This information is provided on at | tached drawings and photographs |
| LATITUDE (degrees, minutes, & section) | GETUDE (degrees, maures, & sessinite) |
| | |
| VIIL FACILITY OWNER | |
| A. If the regulity current to each time reduiting operators on Harbon in Sentence VIII on Fortic 1, "General Intermedical", pages on "X | The thin day to this call gold using to Seatlan IX bearing. |
| 8. If the legalty owner is not the featility degrees as listed in Season VII of Form 1, complete the lefaturing demon | |
| 1. NAME OF FACILITY'S LEGAL OWNER | 2, PHONE NO. (error store 4 ms.) |
| | |
| 1. STREET CR P G, SGX 4. CITY OR TOWN | 1 £ 57.1 6. 3P CODE |
| | |
| IZ. OWNER CERTIFICATION | |
| | rmanon summitted in this and all attached |
| documents, and that based on my inquiry of those individuals immediately reagonable for a supmitted information is true, accurate, and complete, I am aware that there are significant including the possibility of fine and impresonment. | penalties for sugmitting false information. |
| documents, and that based on my industry of those individuals immediately readonable for of supmitted information is true, accurate, and complete, I am aware that there are significant to the complete of th | OATE SIGNED 3 -2 7 - 90 |
| documents, and that based on my industry of those individuals immediately reasonable for a submitted information is true, accurate, and complete, I am aware that there are significant including the possibility of fine and impresentant. **The complete of the complete of | DATE SIGNED |
| documents, and that based on my industry of those individuals immediately reasonable for a submitted information is true, accurate, and complete, I am aware that there are significant including the possibility of fine and improdument. Manager Richland Operations | Transitive for sugmetting false information. DATE SIGNED 3 - 2 7 - 9 0 Transition submitted in this and 48 attached intermediate intermediate. I Servero finer the |
| documents, and that based on my industry of those individuals immediately reasonable for a submitted information is true, accurate, and complete, I am aware that there are significant indusing the possibility of fine and improprient. **MARGENIE OF THE THE SUBMITTERS SUBMITTERS STATES AND CERTIFICATION **LOPERATOR C | Transitive for sugmetting false information. DATE SIGNED 3 - 2 7 - 9 0 Transition submitted in this and 48 attached intermediate intermediate. I Servero finer the |
| documents, and that based on my industry of those individuals immediately reasonable for a submitted information is true, accurate, and complete, I am aware that there are significant industry in possibility of fine and improprient. MANAGEMENT MICHAEL J. Lawrence Manager, Richland Operations United States. Department of Energy L. OPERATOR CERTIFICATION I certify under penalty of law that I have personally examined and am lamilies with the middenments, and that passed on my industry of those individuals immediately resonable for a submitted information is true, accurate, and complete, I am aware that there are significant individually fine possibility of line and imprisonment. | Theresties for sugmitting false information. OATE SIGNED 3 - 2 7 - 9 0 Therefore seamfield in this end all attached obtaining the information, i believe intermetion. Senetties for sugmitting false information. |

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X. OPERATOR CERTIFICATION

I certify under-penalty-of-law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Co-operation

John E. Nolan, President

Westinghouse Hanford Company

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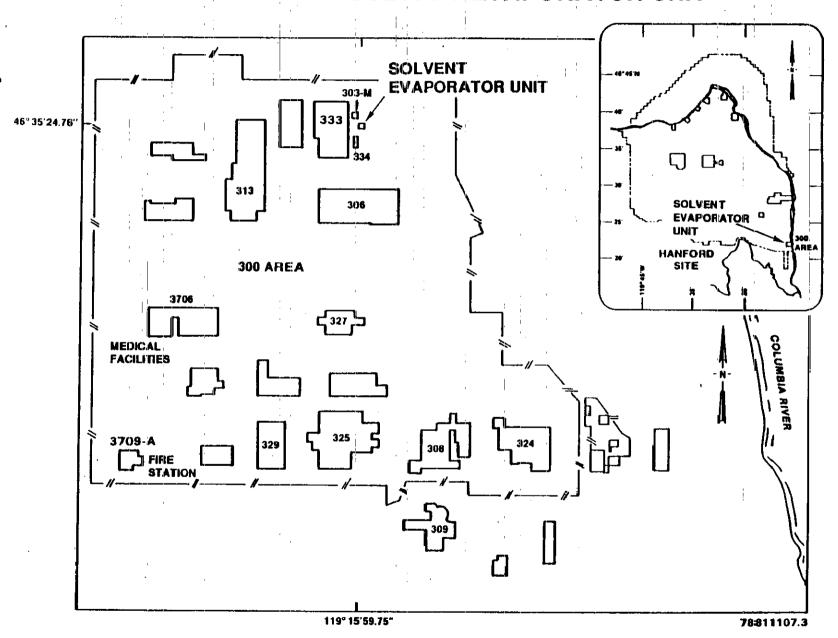
Owner/Operator

Michael J. Lawrence, Manager U.S. Department of Energy Richland Operations Office

3-27-90

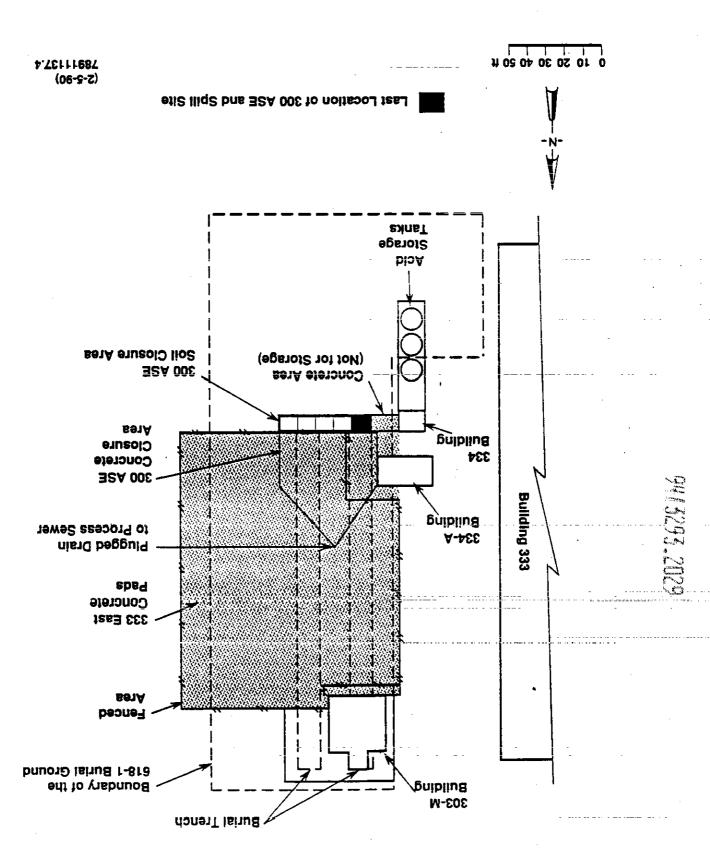
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300 AREA SOLVENT EVAPORATOR UNIT



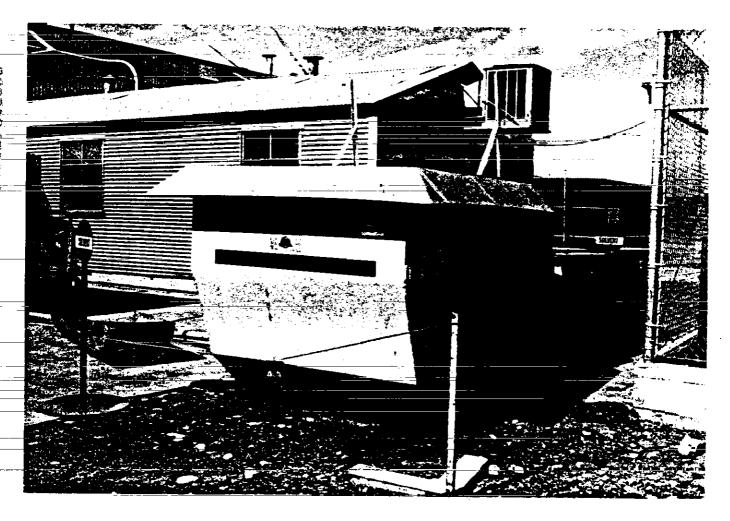
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Closure Plan 300 ASE, Rev. 3 03/30/90



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300 AREA SOLVENT EVAPORATOR UNIT



46°35′24.76" 119°15′59.75"

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APPENDIX B

HANFORD SITE WASTE INFORMATION DATA SYSTEM (WIDS)

CONTENTS

_Waste_Information Data System

2 pages

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HANFORD SITE WASTE INFORMATION DATA SYSTEM (WIDS)

Site Name: 618-1 Burial Ground

Operational: Inactive Status:

Radiological: Released

Site Type: Non-Retrievable Solid Waste

Coordinates: N55310/E14987, N55630/E14987, N55310/E14834,

N55630/E14890, N55390/E14834, N55390/E14890

H-3-9921 (sheet 2) and H-3-1172 Reference Drawings:

Alias Names: ______318-1, Solid Waste Burial Ground No. 1

Location: 300 Area - adjacent to the 333 Building in the

northeast corner of the 300 Area near the

exclusion fence.

Ground (above msl): 390 feet Elevations and Depths:

Water Table (below grade): 48 feet Site Depth (below grade): 20 feet

Waste Category: Mixed Waste

Service Dates: Start: 1944

End: 1951

Waste Volume: Estimated at 350 tons in 37,000 cubic yards

Contaminated Soil Volume: Not available

Overburden Soil Volume: 1,224 cubic yards

Site Area Boundary: 35,520 square feet

Summary Date: July 30, 1987

Site Description: Burial ground consisting of at least two

> ----trenches running north-south, 16 feet wide (surface) x 230 feet long x 8 feet deep. There

also are a series of pits 15 feet wide, running

east-west in the south end, 20 feet deep.

Service History: This burial ground was active from 1944-1951.

> The site contains large quantities about 16.28 tons of uranium and small quantities of

plutonium and fission products from the 300 Area Reactor Fuel Fabrication facilities

----- and laboratories.

Associated Structures: None.

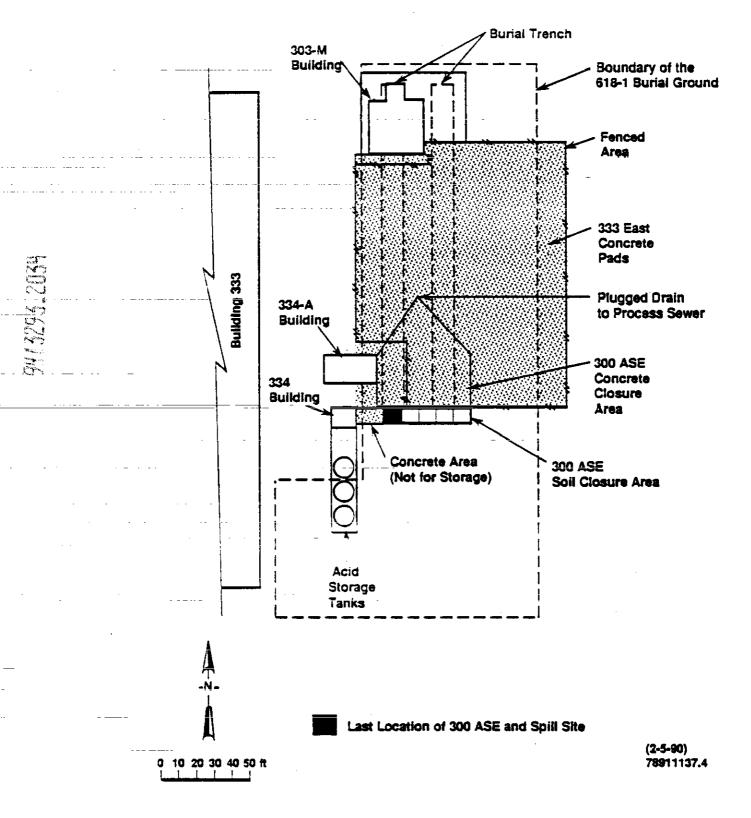


Figure 8-1. 300 Area Solvent Evaporator Closure Area and 518-1 Burial Ground.

APPENDIX C

COMPOSITION AND DESIGNATION OF SOLVENT EVAPORATOR WASTE

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| 3 | Table | C-1. | Toxicity Determination APP C-1 | |
| 5 6 7 | Table | C-2. | Carcinogenesis Determination APP C-2 | |
| / 8 | Jable | .C=3 | _Persistence_Determination APP C=2 | |
| 10 11 | Table | C-4. | Listed Waste Designations | |

46-

48.

APPENDIX C

COMPOSITION AND DESIGNATION OF SOLVENT EVAPORATOR WASTE

Table C-1. Toxicity Determination.

| | <u>Component</u> | <pre>Concentration(%)</pre> | WT% | <u>Category</u> ^a | EC ^b |
|---|--|-----------------------------|------------------------|--|----------------------|
| | Perchloroethylene | 71 | 7.10 E+01 | C C | 7.1 E-02 |
| Ì | 1,1,1-trichloroethane Trichloroethylene | 9 11 | 9.00 E+00 1.10 E+01 | C C | 9.0 E-03 1.1 E-02 |
| | Combination mixture ^c Ethyl acetate Bromine Used Oil Methyl ethyl ketone Methylene chloride Petroleum naphtha | 9 | 9.00 E+00 | C D None None D C None | 9.0 E-03 |
| | -Aluminum | 10ppm | 1 .0 E-03 | None | |
| | Boron | 5ppm | 5.0 E-04 | None | |
| | Calcium | 52ppm | 5.2 E-03 | None | |
| | -Iron | 78ppm | 7.8 E-03 | None | |
| | Lithium | 4ppm _ | 4.0 E-04 | None | |
| | Beryllium | <0.11ppm ^a | 1.1 E-05 | A | 1.1 E-06 |
| | Phosphorus | 25ppm | 2.5 E-03 | X | 2.5 E-03 |
| t | Silicon | 28ppm | 2.8 E-03 | None | |
| | Sodium | 46ppm | -4:6·E-03 | A N = = = | 4.6 E-04 |
| | ZTT CONTUIN | 2ppm | 2.0 E-04 | None | |
| | | | Total | EC | 1.03 E-1 |

^a WAC 173-303-084(5) and 40 CFR 302.4.

Note: Concentration of uranium was below detection limits (less than 10 micrograms per milliliter). If the EC is greater than 1 percent, then the solution is regulated for toxicity as WTO1 (extremely hazardous waste according to WAC 173-303).

920918.0815

^b EC=equivalent concentration; from Registry of Toxic Effects of Chemical Substances 1985-86 Edition Users Guide (RTECS 1987).

^c The combination mixture will be classified as Toxic C for designating purposes.

Calculated concentration.

| 1 2 | Table-C-2Carcinogenesis-Determination. | | | |
|----------------------|---|--|--|--|
| 3 | Component | Concentration (WT%) | | |
| 4 | Perchloroethylene | 71 | | |
| | Trichloroethylene | 11 | | |
| | Beryllium ··· | 1.1E-05 | | |
| 7 | SUM OF WT% OF CARCINOG | ENS >82 | | |
| | Waight-narcent-/wt% |) of total carcinogens must be | | |
| 10 11 | greater than or equ | al to 1 percent in order to be extremely hazardous waste). | | |
| 12 13 14 15 | Table C-3. Per | rsistence Determination. | | |
| 16 17 | Component | Concentration (WT%) | | |
| 17 | Perchloroethylene | 71 | | |
| 18 | 1,1,1-trichloroethane | 9 | | |
| 19 | Trichloroethylene | 11 | | |
| 20 | SUM OF WT% OF CARCINOG | ENS >90 | | |
| 21 22 23 24 | hydrocarbons must be to 1 percent in orde | of total halogenated greater than or equal er to be regulated as | | |
| 26 27 28 29 | WPO1 (extremely haz: Table C-4. List | ted Waste Designations*. | | |
| 30 | Perchloroethylene | F001, WT01, WC01, WP01, D001 | | |
| 31 | 1,1,1-trichloroethane | F002, WP01 | | |
| 32 | Trichloroethylene | F001, WC01, WP01 | | |
| 33 | Ethyl acetate | F003 | | |
| 34 | <u>Me</u> thyl ethyl ketone | F005 | | |
| 35 | Methylene chloride | F001 | | |
| 36 37 | * Based on WAC 173-30 | 3 dangerous waste listings. | | |
| 38 39 | | | | |

APPENDIX D PROCEDURES, WORK AUTHORIZATIONS, BURIAL RECORDS, AND COMPLIANCE CHECKSHEETS

NOTE: These historical procedures are reprinted without benefit of current editorial standards: These procedures do not necessarily reflect the current Hanford Site environmental practices.

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| 3 4 5 | UNI-M-46 | Waste Solvent System | 2 Pages |
| 1 2 3 4 5 6 7 8 9 | UNI-M-58 | Degreaser Solvent Fill and Disposal System (Issued 1/11/85) | 3 Pages |
| 9 10 11 | UNI-M-58 | Degreaser Solvent Fill and Disposal System (Issued-1/20/84) | 4 Pages |
| 12 13 | UNI-M-58 | Degreaser Solvent Fill and Disposal System (Issued 9/18/79) | 3 Pages |
| 14 15 16 | - UNI-M-58 | Perchlor Fill and Disposal System (Issued 6/20/78) | 3 Pages |
| 17 18 19 | UNI-M-58 | Perchlor Fill System (Issued 4/11/77) | 2 Pages |
| 20 21 22 23 | UNI-M-58 | Trichlor Fill System (Issued 1/16/75) | 2 Pages |
| 24 25 26 27 28 29 | PWR-B-441 | Sludge Solidification Procedures (Issued 8/8/85) | 4 Pages |
| | RWP-300-1-85 | Solidification and Disposal of Solvent Sludges (Issued 8/15/85) | l Page |
| 30 31 32 | UNI-M-57 | Solidifying and Packaging of Waste solvents (Issued 11/12/85) | 9 Pages |
| 33 34 | 3-1A-7G-1 | Burial Compliance Checksheet Dated 6/25/85 | 4 Pages |
| 35 36 | 3-1A-7L-1 | Burial Compliance Checksheet Dated 1/21/86 | 4 Pages |
| 37 38 39 | 313-UNC-86-10 | Solid Waste Burial Record | l Page |
| | UNI-M-38 | Hazardous Work Permits | l Page |
| 40 41 | WA 85-2510 | Disposition of Solvent Evaporator | 5 Pages |
| 42 43 | 3-5B-1A-1 | Burial Compliance Checksheet | 4 Pages |
| 44 45 46 | 313-UNC-86-4 | Solid Waste Burial Record | l Page |



UNC NUCLEAR INDUSTRIES

FUELS OPERATIONS DIVISION ENVIRONMENTAL CONTAMINATION CONTROL PROCEDURES

Subject

ECC-114-- WASTE-SOLVENT SYSTEM

Fuels Engineering

BASIS

At the present time there is no absolute environmentally acceptable manner (such as a high temperature incinerator) for disposing of waste solvents at Hanford. Most of the solvents from Fuels Operations Division are waste vapor degreasing solvents (trichloroethylene, 1,1,1 trichloroethane and perchloroethylene) and can be contaminated with uranium and be from degreasing uranium billets and Be-Zr-2 braze rings.

A dumpster has been provided at a remote distance from occupied areas and within a restricted area (east of the 334 Building) and the waste solvents are poured into this dumpster where the excess solvent is allowed to slowly evaporate. When the dried sludge has built-up sufficiently, the sludge and excess solvent will be packaged as "Liquid Organic Material" in 17C drums for disposal as per U contaminated oil (see ECC-104).

CONTROLS

A. Administrative Controls

The use of the solvent dumpster shall be limited to organic solvents that cannot be disposed of in the waste oil system as per ECC-104. (No heavy oils, greases or aqueous solutions.)

B. <u>Inspection of Facilities</u>

Inspection of the solvent dumpster on the east side of 334 Building shall be conducted and documented annually by facility management.



UNC NUCLEAR INDUSTRIES

FUELS OPERATIONS DIVISION ENVIRONMENTAL CONTAMINATION CONTROL PROCEDURES

UNI -M-4 6

Date Issued Page No.
7-15-83 2 3 f

Supermost Issue Cated
6-1-82

Subject

ECC-114 - WASTE SOLVENT SYSTEM

Fuels Engineering

Revision 1, Dated April 17, 1978:

Basis: Added 1,1,1 trichloroethane to list of degreasing solvents.

Revision 2, Dated September 26, 1980:

Basis: Now require that when the sludge builds up in the waste dumpster it will be barrelled for disposal (not burying the dumpster).

Control B: Deleted DUN-M-31.

Revision 3, Dated June 1, 1982:

Basis: Sludge-in-dumpster to be disposed of in 17C drums as per ECC-104 not in 17H drums as solid waste.

Revision 4. Dated July 15, 1983:

Basis: Changed "Fuels Production Department" to "Fuels Operations Divisi.

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| UNC NUCLEAR INDUSTRIES | UNI -M- | 58 | |
| FUELS PRODUCTION DEPARTMENT | Frankure No. | Peep Ne. 1 er 3 | |
| OPERATING PROCEDURES | 7-11-85 | 1 - 20 - 84 | |
| | Issued By | | |
| DEGREASER SOLVENT FILL AND DISPOSAL SYSTEM | FUELS | FUELS OPERATIONS | |

I. BASIS

Clean perchlorosthylene for filling the degreasers is obtained in drums from 303-F. A portable pump is used to transfer from the drum into the degreaser.

No. 3 degreaser uses solvent: 1,1,1-trichloroethane. This solvent is received in a 54 gallon drum and is stored near the degreaser. The solvent is pumped from the drum into the degreaser with a portable pump. The pump is stored behind tank #24.

II. REFERENCE

DUN-5601 UNI-M-38 Job Hazard Breakdown #33-1

III. EQUIPMENT NEEDED

Bump cap
Acid goggles
Coveralls
Safety snoes or toe protectors
Leather or rubber gloves
Oil sorbent smeets

IV. PROCEDURE

A. Filling of the Degreasers

When solvent is needed in a degreaser, the chem bay chief operator will bring it into the 333 Building in 55 gallon drums and pump it into the degreaser.

CAUTION: The degreasers using perchlorethylene receive the clean—solvent—into the cold side, it is possible to overfill them as the perchlorethylene—goes—into the degreaser—faster than it flows from the cold_side_to_the hot_side. —Oue_to_this delay in the perchlorethylene moving from the not side, shut off perchlorethylene fill valve, when the level in the hot side is approximately !" below the desired level. This will prevent overfilling. Wait about 2 minutes, check solvent level and add more if needed.

| Review Cates and Initials | | | | |
|------------------------------|---------------|----------|---|------|
| Supervisor, Fues Operations | Additional DV | =-75/6,- | Aparoves by After The Metical Manager, Puese Operations | 1455 |

UNC NUCLEAR INDUSTRIES

FUELS PRODUCTION DEPARTMENT OPERATING PROCEDURES

FUELS OPERATIONS

Tide

DEGREASER SOLVENT FILL AND DISPOSAL SYSTEM

B. <u>Emotying Degreaser</u>

Each degreaser (except end cap and support etch) is equipped with a spray wand and a drain line to remove the solvent. Use the same pump to remove solvent from #3 degreaser that was used to fill it.

- Close overflow line and boil off solvent from vapor zone to condensate storage tank. Shut off heater and let vapor zone cool down.
- 2. Pump out cold reservoir by using the spray wand. Pump into barrels. Return the spray wand properly to its holder immediately upon completion of pumping.
- 3. Pump out cool solvent in boiling side by attaching a portable pump to drain line. Pump into barrels (old black trichloroethane barrels, which are stored next to 334 by the waste solvent dumpster, are used to transfer the dirty solvent).
- C. A waste solvent dumpster is located east of the 334 Building. Transfer barrels of dirty solvent to waste solvent dumpster and pour into dumpster.
- D. If the solvent level in the dumpster is high, speed up the evaporation by using the steam coils:
 - 1. Set up "Warning Steam Hose" signs in 334 Building and east of 334 Building near nose.
 - 2. Turn on steam in 334 Building.
 - 3. Allow solvent to evaporate to desired level and then turn off steam.

| P. Krik 1-9-55 | Review Cases and Initials | | | |
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UNC NUCLEAR INDUSTRIES

FUELS PRODUCTION DEPARTMENT -----OPERATING PROCEDURES

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| 1-11-85 | 1-20-84 |

Title

SH2 2528 16

DEGREASER SOLVENT FILL AND DISPOSAL SYSTEM

FUELS OPERATIONS

V. ACCIDENTAL SPILLS OR LEAKS

- A. If any solvent accidentally gets on you, follow the emergency procedure as defined in Chemical Bulletins #3 and #26 from UNI-M-38.
- B. If any solvent is spilled onto the ground or into a trench, notify supervision immediately. If oil sorbant sheets are handy use them to contain the spill (even in a trench with water) and then notify supervision. Supervision will arrange to properly dispose of the solvent soaked sneets.

WP#0025E

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| | PUELS | OPERATIONS . | | | |

DEGREASER SOLVENT FILL AND DISPOSAL SYSTEM

I. BASIS

Clean perchloroethylene for filling the degreasers is obtained from the 313 pumping station. It can either be pumped directly to the degreasers or it can be put into the solvent holding tank in the chem bay mezzanine and later be used to fill the degreaser by gravity flow. The normal procedure is to use the percholorethylene from the solvent still storage tank.

No. 3 degreaser uses solvent: 1,1,1-trichloroethane. This solvent is received in a 54 gallon drum and is stored near the degreaser. The solvent is pumped from the drum into the degreaser with a portable pump. The pump is stored behind tank #24.

II. REFERENCE

OUN-5601 UNI-M-58 Job Hazard Breakdown

III. EQUIPMENT NEEDED

Bump cap Acid goggles Coveralls Safety shoes or toe protectors Leather or rubber gloves

IV. - PROCEDURE

A. To obtain fresh perchlorethylene from the 313 Building, contact the 313 fuel recovery operator and notify him that you are ready to receive perchlorethylene. Open valve T-1 and watch the storage tank until it is full. Shut off valve T-1 and tell the 313 operator that the pumping is completed. Yalve T-2 is in the supply line to the degreasers and is left open.

_8. Filling of the Degreasers

When perchlorethylene is desired in a degreaser in the 333 Building, open the fill valve located on the degreaser. Each valve is numbered as listed:

| Review Datm and Installs | | - - - | | |
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UNC NUCLEAR INDUSTRIES

FUELS PRODUCTION DEPARTMENT OPERATING PROCEDURES

| Date | Supersede | Fee | Page | No. | Page

Tide

DEGREASER SOLVENT FILL AND DISPOSAL SYSTEM

FUELS OPERATIONS

- No. 1 degreaser (vacublast) valve #T-7
- No. 2 degreaser (final etch) valve #T-11.
- No. 3 degreaser (end cap and support etch) filled from barrel of
- 1,1,1-trichloroethane
- No. 4 degreaser (billet cleaning) valve #T-4
- No. 5 degreaser (component cleaning) valve #T-13
- No. 6 degreaser (billet lube) valve #T-16

Observe the filling of the degreaser and shut off the valve when the desired level is reached.

CAUTION: The degreasers using perchlorethylene receive the clean solvent into the cold side, it is possible to overfill them as the perchlorethylene goes into the degreaser faster than it flows from the cold side to the hot side. Due to this delay in the perchlorethylene moving from the hot side, shut off perchlorethylene fill valve, when the level in the hot side is approximately 1" below the desired level. This will prevent overfilling. Wait about 2 minutes, check solvent level and add more if needed.

C. Emptying Degreaser

Each degreaser (except #3) is equipped with a spray wand and a drain line to remove the solvent. Use the same pump to remove solvent from #3 degreaser that was used to fill it.

- Pump out cold reservoir by using the spray wand. Pump into barrels.
- Pump out cool solvent in boiling side by attaching a portable pump to drain line. Pump into barrels.
 - Fuels Maintenance will supply pump, fitting and make connections.
 - b. Barrels supplied by Materials Services.
- D. A waste solvent dumpster is located east of the 334 Building. Transfer barrels of dirty solvent to waste solvent dumpster and pour into dumpster.

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SAMPLE

UNC NUCLEAR INDUSTRIES

FUELS PRODUCTION DEPARTMENT OPERATING PROCEDURES

Tide

DEGREASER SOLVENT FILL AND DISPOSAL SYSTEM

FUELS OPERATIONS

- E. If the solvent level in the dumpster is high, speed up the evaporation by using the steam coils:
 - 1. Set up "Warning Steam Hose" signs in 334 Building and east of 334 Building near hose.
 - Turn on steam in 334 Building.
 - Allow solvent to evaporate to desired level and then turn off steam.

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Property Dates
and Initials

Property Dates

Approved by

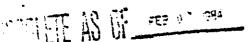
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| FUELS PRODUCTION DEPARTMENT | Procedure No. Page No. 4 of 4 |
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FUELS PRODUCTION DEPARTMENT OPERATING PROCEDURES

FUELS OPERATION

SAMPLE

UNI -M-58

Title

Procedure No

DEGREASER SOLVENT FILL AND DISPOSAL SYSTEM

E=14

I. BASIS

Clean perchloroethylene for filling the degreasers is obtained from the 313 pumping station. It can either be pumped directly to the degreasers or it can be put into the solvent holding tank in the chem bay mezzanine and later be used to fill the degreasers by gravity flow. The normal procedure is to use the perchloroethylene from the solvent still storage tank.

No. 3 degreaser uses solvent: 1,1,1-trichloroethane. This solvent is received in a 54 gallon drum and is stored near the degreaser. The solvent is pumped from the drum into the degreaser with a portable pump. The pump is stored behind tank #24.

II. REFERENCE

DUN-5601 UNI-M-38

Job Hazard Breakdown

III. EQUIPMENT NEEDED

- 1. Acid goggles
- 2. Coveralls
- 3. Safety shoes and toe protectors
- 4. Leather or rubber gloves

IV. PROCEDURE

A. To obtain fresh perchloroethylene from the 313 Building, contact the 313 fuel recovery operator and notify him that you are ready to receive perchloroethylene. Open valve T-1 and watch the storage tank until it is full. Shut off valve T-1 and tell the 313 operator that the pumping is completed. Valve T-2 is in the supply line to the degreasers and is left open.

B. Filling of the Degreasers

When perchloroethylene is desired in a degreaser in the 333 Building, open the fill valve located on the degreaser. Each valve is numbered as listed:

No. 1 degreaser (vacublast) valve #T-7

No. 2 degresser (final etch) valve #T-11

No. 3 degreaser (end cap and support etch) filled from barrel of 1,1,1

trichloroethane

No. 4 degreaser (billet cleaning) valve #T-4

No. 5 degreaser (component cleaning) valve #T-13

No. 6 degresser (billet lube) valve #T-16

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FUELS FRODUCTION DEPARTMENT OPERATING PROCEDURES

FUELS OPERATION



8E-M-IKU

Title

Procedure No

DEGREASER SOLVENT FILL AND DISPOSAL SYSTEM

E-14

Observe the filling of the degreaser and shut off the valve when the desired level is reached.

CAUTION: All of the degreasers receive the clean perchloroethylene into the cold side, it is possible to overfill them as the perchloroethylene goes into the degreaser faster than it flows from the cold side to the hot side. Due to this delay in the perchloroethylene moving from the cold side to the hot side, shut off perchloroethylene fill valve, when the level in the hot side is approximately 1" below the desired level. This will prevent overfilling. Wait about 2 minutes, check solvent level and add more if needed.

C. Emptying Degreaser

Each degreaser (except #3) is equipped with a spray wand and a drain line to remove the solvent. Use the same pump to remove solvent from #3 degreaser that was used to fill it.

- 1. Pump out cold reservoir by using the spray wand. Pump into barrels.
- 2. Pump out cool solvent in boiling side by attaching a portable pump to drain line. Pump into barrels.
 - a. Fuels Maintenance will supply pump, fitting and make connections.
 - b. Barrels supplied by Material Services.
- D. A waste solvent dimpster is located east of the 334 Building. Transfer barrels of dirty solvent to waste solvent dimpster and pour into dimpster.
- E. If the solvent level in the dumpster is high, speed up the evaporation by using the steam coils:
 - 1. Set up 'Warning Steam Hose" signs in 334 Building and east of 334 Building near nose.
 - 2. Turn on steam in 334 Building.
 - 3. Allow solvent to evaporate to desired level and then turn off steam.

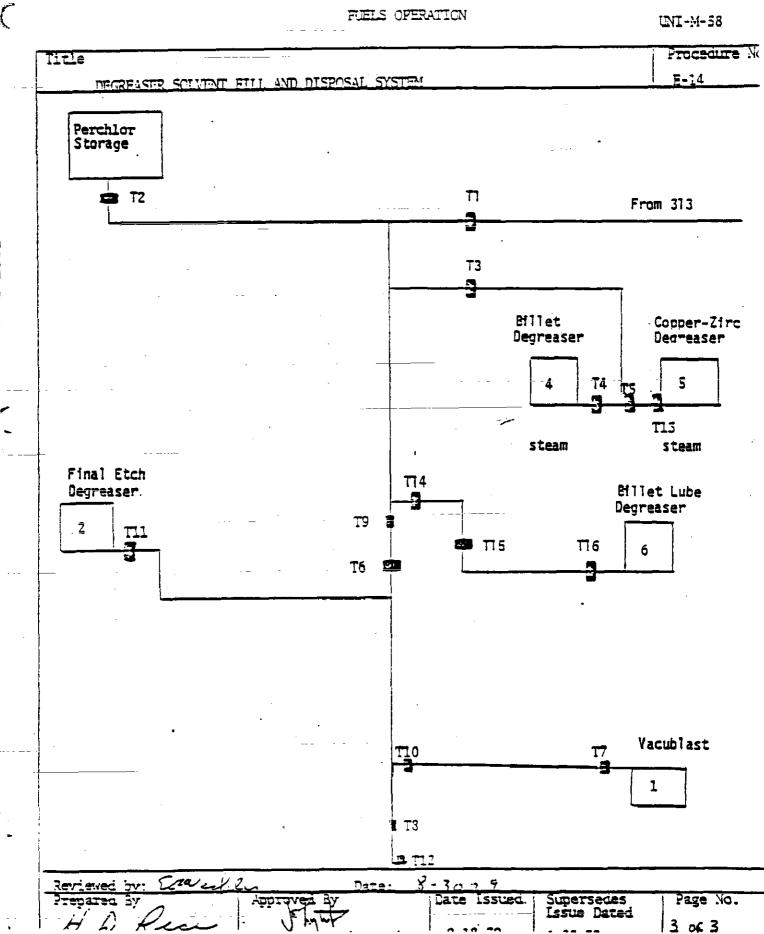
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FUELS PRODUCTION DEPARTMENT

SAMPLE

OPERATING PROCEDURES



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-- FUELS -PRODUCTION- DIVISION -- OPERATING PROCEDURES

SAMPLE

SHOP OPERATIONS

82-M-INU

Title

PERCHLOR FILL AND DISPOSAL SYSTEM

Procedure No. CA-748 E-14

I. BASIS

LECOLLIE AND UT COT : 1 1979

Clean perchlor for filling the degreasers is obtained from the 313 pumping station. It can either be pumped directly to the degreasers or it can be put into the perchlor still holding tank in the chem bay meazzanine and later be used to fill the degreasers by gravity flow. The normal procedure is to use the perchlor from the perchlor still storage tank.

II. REFERENCE

DUN-5601 UNI-M-38 DUN-5750

-Job-Hazard-Breakdown

III. EQUIPMENT NEEDED

- 1. Acid goggles.
- 2. Coveralls
- 3. Safety shoes and toe protectors.
- 4. Leather or asbestos gloves.

IV. PROCEDURE

A. To obtain fresh perchlor from the 313 Building, contact the 313
----fuel recovery operator and notify him that you are ready to receive perchlor. Open valve T-1 and watch the storage tank until it is full. Shut off valve T-1 and tell the 313 operator that the pumping is completed.

B. Filling of the Degreasers

When perchlor is desired in a degreaser in the 333 Building, open the valve nearest the degreaser. Observe the filling of the degreaser and shut off the valve when the desired level is reached.

AUTION: All of the degreasers receive the clean perchlor into the cold side, it is possible to overfill them as the perchlor goes into the degreaser faster than it flows from the cold side to the hot side. Due to this delay in the perchlor moving

from the cold side to the hot side, shut off perchlor fill valve before the desired level is reached to prevent over-

filling.

| Prepared By Approved By | Date Issued | Supersedes Issue Dated | Page No. |
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| Sunv., Shon Operations Mar. Shop Operations | 6-20-78 | 4-11-77 | 1 of 3 |

FUELS PRODUCTION DIVISION OPERATING PROCEDURES

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SHOP OPERATIONS

UNI-M-58

Title

Procedure No.

PERCHLOR FILL AND DISPOSAL SYSTEM

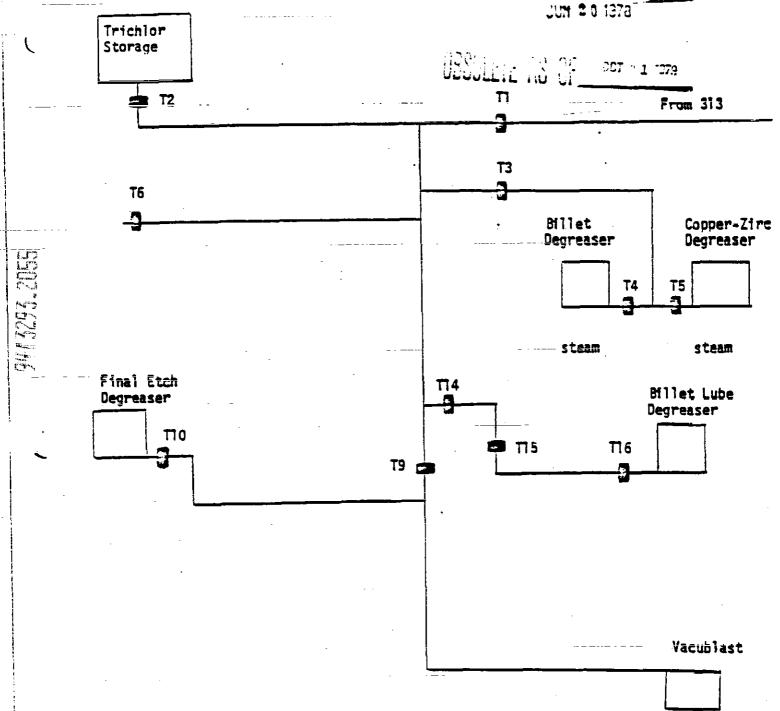
CA-748 E-14

C. Emptying Degreaser

- 1. Pump out cold reservoir by using spray wand or attaching a portable pump to drain line. Pump into barrels.
- 2. Pump out cool solvent in boiling side by using supplied pump or attaching a portable pump to drain line. Pump into barrels.
- D. Transfer barrels of dirty solvent to waste solvent dumpster and pour into dumpster.
- E. If the solvent level in the dumpster is high, speed up the evaporation by using the steam coils:
 - 1. Uncoil hoses at dumpster and in 334 Building and attach.
 - 2. Set up 'Warning Steam Hose' signs in 334 Building and east of 334 Building near hose.
 - 3. Turn on steam in 334 Building.
 - 4. Allow solvent to evaporate to desired level and then turn off steam.
 - 5. Let steam hose cool before disconnecting and coiling up hose.

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Sunv., Shon Operations Mar. Shop Operations 6-20-78 4-11-77 2 of 3



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FUELS PRODUCTION DIVISION &

SHOP OPERATIONS

UNI-M-58

Title

END CLOSURE - TRICHLOR FILL SYSTEM

Procedure !

CA-748 E-/

I. BASIS

Clean trichlor for filling the degreesers is obtained from the 313 pumping station. It can either be pumped directly to the degreesers or it can be put into the trichlor still holding tank in the chem bay mezzanine and later be used to fill the degreesers by gravity flow. The normal procedure is to use the trichlor from the trichlor still storage tank.

II. PROCEDURE

A. To obtain fresh trichlor from the 313 Building, contact the 313 fuel recovery operator and notify him that you are ready to receive trichlor. Open valve T-1 and watch the storage tank until it is full. Shut off valve T-1 and tell the 313 operator that the numbing is completed.

B. Filling of the Degreesers

When trichlor is desired in one of the seven degreasers in the 333 Building, open the valve nearest the degreaser. Observe the filling of the degreaser and shut off the valve when the desired trichlor level is reached.

CAUTION:

chlor into the cold side, it is possible to overfill them as the trichlor goes into the degreeser faster than it flows from the cold side to the hot side. Due to this delay in the trichlor moving from the cold side to the hot side, shut off trichlor fill valve before the desired level is reached to prevent overfilling.

A. N. Stinson

Approved By
H. C. Money

Date Issued

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1 of 2

UNI-M-58 Ca-748 TRICHLOR FILL SYSTEM E-14 OBSOLETE AS OF JUN 30 1978 Trichlor Storage T2 TI From 313 T3 T6 8fllet Copper-Zirc Degreaser Degreaser **T4 T5** steam steam Final Etch ∏4 Billet Lube Degreaser Degreaser TTO **27** T15 T16 T9 📥 Vacublast



FUELS PRODUCTION DIVISION

OPERATING PROCEDURES
SHOP OPERATIONS

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UNI-M-58

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PERCHLOR FILL SYSTEM

Procedure No CA-748 E-

I. BASIS

Clean perchlor for filling the degreasers is obtained from the 313 pumping station. It can either be pumped directly to the degreasers or it can be put into the perchlor still holding tank in the chem bay meazzanine and later be used to fill the degreasers by gravity flow. The normal procedure is to use the perchlor from the perchlor still storage tank.

II. REFERENCE

DUN-5601 UNI-M-38

DUN-5750

Job Hazard Breakdown

III. EQUIPMENT NEEDED

- 1. Acid goggles.
- 2. Coveralls
- 3. Safety shoes and toe protectors.
- 4. Leather or asbestos gloves.

IV. PROCEDURE

A. To obtain fresh perchlor from the 313 Building, contact the 313 fuel recovery operator and notify him that you are ready to receive perchlor. Open valve T-1 and watch the storage tank until it is full. -Shut-off-valve T-1 and tell the 313 operator that the pumping is completed.

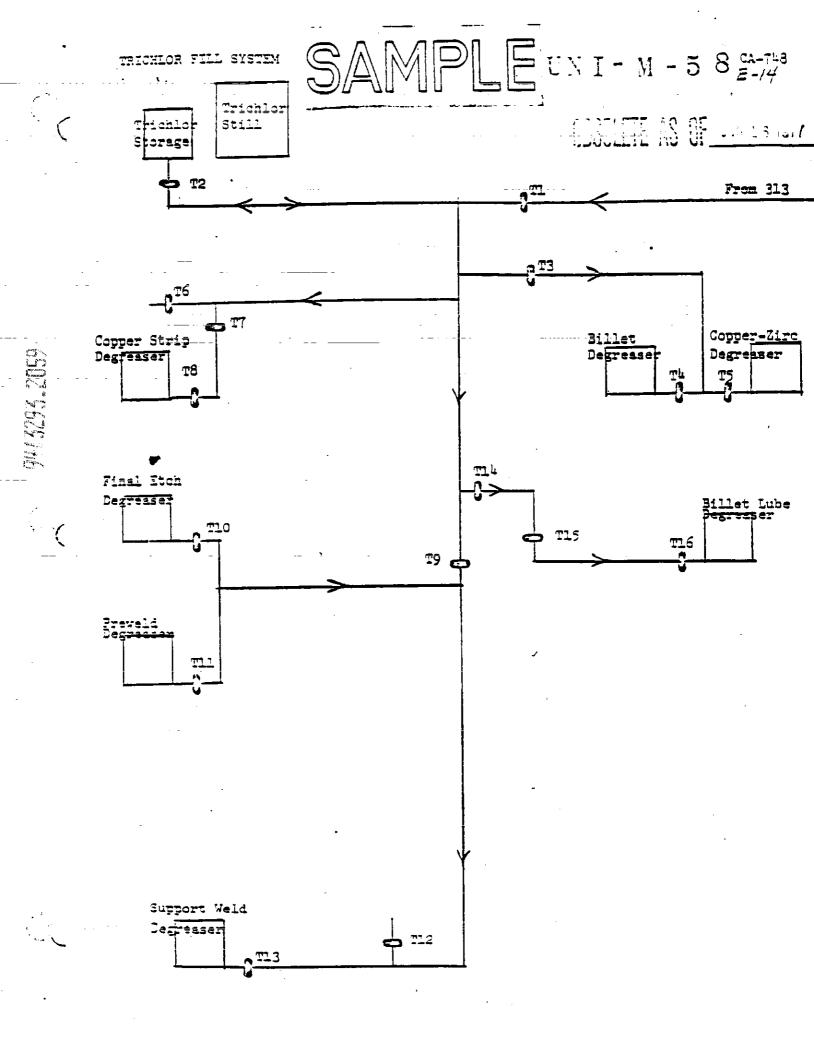
B. Filling of the Degreasers

When perchlor is desired in a degreaser in the 333 Building, open the valve nearest the degreaser. Observe the filling of the degreaser and shut off the valve when the desired level is reached.

CAUTION:

All of the degreasers receive the clean perchlor into the cold side, it is possible to overfill them as the perchlor goes into the degreaser faster than it flows from the cold side to the hot side. Due to this delay in the perchlor moving from the cold side to the hot side, shut off perchlor fill valve before the desired level is reached to prevent overfilling.

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SAMPLE

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| PUELS OPERATIONS | |
| PROCESS WORK REQUEST NO. 8-441 | 至 334人 |
| PROCESS WORK REGUEST TO | |
| To | MATERIAL USE |
| Production Control | Customer Use |
| Process Control | Noncustomer Use |
| NoOf Elements Involved Mades | SPECIFICATIONS WAIVED |
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| Prom. Aug., 1985 To. Nov., 1985 | |
| Provide necessary instructions for the | Test . Specification Clarge . |
| to a light figure and disposal of accumulated solvent | t sludges in the waste solvent evaporator |
| Then ind the 334-A Building. The volume of sludge i | is starting to limit the capacity of the |
| evaporator to receive additional solvent wastes. | ine accumulated sludges need to be |
| disposed of to allow treatment of future solvent | 143 (43 . |
| | |
| Special Equipments And Material | |
| | idifu waetae |
| Use of special chemical Gypsum formulation to solu | idity wastes. |
| | |
| | |
| Special Procedures And Responsibility | |
| Production Control personnel will recover the eval | novator eludges and under direction of |
| Fuels Engineering treat the waste in 30 gallon dra procedure. Overpack and shipping instructions are checksheet. | ums as detailed in the attached |
| An RWP will be prepared by Production Control to augment sanitary measures. | prevent contamination release and |
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| APPROVALS | ROTATINI |
| Director, Fuers Engineering Manager, Fuers Quarty Assura | HF Jensen Zij |
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| Manager, Fuels Production Supervisor, Fuels Inspection | Cirectos, Suesi Manufacturing |
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| Manager, Process Control | ~; CITELLE (0-0-0) |
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EM-4400-188 (1-44)



PWR 8-441 Attachment 1

Procedure for the Solidification of Perchlorethylene Solvent Wastes

- Place a 30 gallon drum in the catch basin next to the perchlor evaporator.
- 2. Using a hand-held electric pump, transfer 13 gallons of waste from the evaporator into the 30 gallon drum.
- 3. Add 1-1/2 gallons of Envirostone liquid emulsifier and 6-1/2* gallons of water, then mix with a clamp-on agitator to create a uniform emulsion.
- 4. Add 160 lbs. of Envirostone cement while mixing.
- 5. Mix for 10-15 minutes, then let the mixture set up.
- 6. After the mixture has hardened, add Dolomite to the top of the 30 gallon-drum and attach lid.
- 7.— Overpack the 30 gallon drum in a 55 gallon non-TRU drum and place Dolomita in between the drums.
- 8. Place the lid on the 55 gallon drum and torque the locking ring bolt to 40 ft-lbs.minimum.
- 9. Label the 55 gallon drum per the attached Burial Compliance checksheet.
- 10. Place the drums in the waste materials storage area east of the 333 Bldg. until shipment to RHO.

* Amount of water may be subject to change based on water already present in waste.

SAMPLE

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| | Hinor (Use Control _ Factor 1-7) | Moderate (Use Control Factor | Major (Use Control Factor 1-2) | |
|--|----------------------------------|------------------------------------|--------------------------------|---|
| Personal Injury | 4 | | | |
| Equipment Damage | . 7. | | | |
| Violation of Nuclear Safety Specification | 7 | | | |
| Fire from Pyrophoric Metals | 7 | | | - |
| Environmental Release | 4 | | | |

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MINIMIZE MY SERIOUS INCIDENT

- WL Clemans 8/7/8,

ATTACHMENT I

SAMPLE

HAZARO ANALYSIS CHECKLIST

Job To Be Performed

| | Building 334A Date KNECKSINEY Shift DAY- |
|-------|--|
| | Description of Job: SOLIDIRY AND PACKAGE SULVENT EVAPORATOR WASTES PLR PWR B-44 |
| | EUNTURATURE SENSTES FIZE TOOK |
| | |
| | |
| | Associated Hazards* toxic chemicals release Yes radiological work No. |
| | flammables/explosives No high temperature No |
| • | asbestos release No hazard atmosphere Vo |
| - | nuclear safety No pyrophoric material No requirement |
| | protective clothing <u>Yes</u> solid, liquid, <u>Possifich</u> requirement gaseous release to environment |
| • | Indicate "Yes" or "No" for each hazard item. If "Yes", the special instruction section shall indicate how that hazard is to be controlled. |
| | Special Instructions TIR SOLVENT SLUDGES CONTAIN BUCHLORETTYLENE |
| _ | SOLULAT CONFLER WITH MECUNIATIONS OF UMEIONS CLAPNIC |
| | CONTAMINANTS - CAME MUST BE EXCRESSED TO PREVENT |
| | SPILLAGE. AND SKIN CONTAMINATION |
| | Approval: LIH Clemani 8/7/8) - Section Manager |

Revised 8/28/84

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| | | TEMPORARY RADIA | TION WOR | | | |
| ./88 | Building | Valid Date of Procedure | | | Tel | mporery RWP No. |
| 300 | 334-A | From: 8-9-85 | To: | 12-9-85 | | 300-1-85 |
| peation Description of | f Work: Solidif | ication and Disposa | l of Solv | vent Sludges | | ACCOUNT FAILURENT |
| | | RADIOLOGICAL CONDITION | \$ | | _ | PROTECTIVE EQUIPMENT REQUIREMENTS |
| _ Low Le | | tion-Liquid Sludge | | | HEAD | Cap Hood Rubber Plastic Face Shield |
| | RADIA | TION MONITORING REQUIR | EMENTS | | | <u> </u> |
| Contact | Am **Sefore Entering Zor **If Conditions Chang | | Phone# Pax未 - | -6-3311 816 | | 1 Pr. Coveralis 2 Pr. Coveralis No Personal Outer Clothes Waterproof Outer Layer |
| | . · · | INSTRUCTIONS | - | | | Canves Gigves Surgeons Gloves |
| | ly with all Fu Rules". | els Operations "Emp | oloyee Ra | diation | 1 < 1 | Rubber Gauntiets Canners Gloves |
| and | storage of dru | | | | | Carvés Boots Shoe Covers |
| per | UNI-M-29. | s) shall be <200 <u>c</u> | • | packaged | 1 | Aubbers British Leggings |
| 4. Comp | ly with Proces | s Work Request No. | B-441. | | H | Full Face |
| | · | - | | | RESPIRATORY | Air Supplied Hood Fresh Air SCBA Trottection as specified by |
| - | | • | | | MATERS | © TLD □ PADI |
| , | <i>:</i> | • | | | PERSONNEL | Self-Reading Procise Finger Fling The Process of |
| | | | APPROVALS | | <u> </u> | |
| JK | Marshall | 8-14-85 | | F Paul | | 8-16-85 |
| Ma. | Harry E | 15/85 | | ; | , | |
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FUELS MANUFACTURING DEPARTMENT OPERATING PROCEDURES

UNI-M-57 REVI 0-411 11-12-85 VE1.

SOLIDIFYING AND PACKAGING OF WASTE SOLVENTS

PRODUCTION CONTROL

I STANDED BY

A. PURPOSE

This procedure describes the process for solidifying waste solvents. Solidification is necessary for the disposal of this material.

DESCRIPTION

Solvents are used in the manufacturing process of N Reactor fuels. The solvents are used in degreasers to clean the fuel elements and are routinely changed out and pumped into 55-gallon drums for transport. The drum of waste solvent is then solidified.

Waste solvents are solidified by mixing the solvents with cement and liquid emulsifiers. The solidified solvents are packaged in S5-dallon 17H "Non-Tru" drums for disposal.

C. REFERENCES

DUN-5601, "Manufacturing Process Specifications"...

DUN-M-29, "N-Fuels Process Control Procedures".

UNI-M-32. "Radiation Work Procedures".

UNI-M-38, - Industrial -Safety Manual".

UNI-M-59, "Job Hazard Breakdown".

RHO-MA-222 REV1, "Hanford Radioactive Solid Waste Packaging, Storage, and Disposal Requirements".

D. EQUIPMENT

30 Gallon 17-H Drums

Leather Gloves

55 Gallon 17-H Drums

Rubber Gloves

Absorbent Material SWP Clothing

Drum Labels

Dolomite

Envirostone Cement

Drum Pumps

Catch Basin

Drum Agitator

.Envirostone Liquid Emulsifier

Extension Cord

Water_Hose

Forklift w/drum gipping attach.

Air Hose

Bucket

| and-Initiation A. | | |
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| Supermeer 7, with it will start the supermeer of the supe | 11-12-85 | Manager, Production Control |

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FUELS MANUFACTURING DEPARTMENT. (OPERATING PROCEDURES

Title

SOLIDIFYING AND PACKAGING OF WASTE SOLVENTS

PRODUCTION CONTROL

Tape Measure Forklift Transport Tray Rubber Shoe Covers Paint Stick Marker
Bump Cap Goggles

E. PROCEDURE

- Transport of Solvent Drums
 - a. A Metal Operator, Production Control, shall transport the solvent drums to the solidification location. The Operator shall:
 - 1) Assure that the durms are sealed before attempting to move them.
 - 2) Assure that a RM survey has been done on the drum and a "Conditional Radiation Release" label is in place on the drum. See attachment I.
 - 3) Place one drum in the transport tray.

 WARNING: Transport only one drum of waste solvent at a time.

- a. Metal Operators, Production Control, shall perform the solidification process. The Operators shall:
 - 1) Obtain a new empty 30 gallon 17-H drum.
 - 2) Using a tape measure and paint stick marker, place two marks in the drum. Measuring from the bottom of the drum, place the marks at 10-1/2 inches and 16-1/2 inches respectively on the inside of the drum.

NOTE: The marks-are used-as a gauge when adding ingredients to the drum.

- 3) Place a new empty 55 gallon 17-H drum in the catch basin with "Radioactive Waste" label affixed to one side. See attachment II.
- 4) Place the marked 30 gailon drum inside a 55 gallon drum.

| Review Cattles and Installs | | | | | |
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SOLIDIFYING AND PACKAGING OF WASTE SOLVENTS

PRODUCTION CONTROL

- 5) Place a lid on the 30 gallon drum.
- 6) Fill the void between the drums with dolomite.
- 7) Remove the lid from the 30 gallon drum.
- 8) Using an electric solvent pump, transfer 13 gallons of waste solvent from the drum into the 30 gallon drum. Fill to first mark from the bottom of the drum at 10-1/2 inches.
- 9) Using a water hose, add 6-1/2 gallons of water to the 30 gallon drum. Fill to the second mark from the bottom of the drum at 16-1/2 inches.
- 10) Using the hand pump equipped with gallon meter, pump 1-1/2 gallons of Envirostone liquid emulsifier into a bucket and add to the 30 gallon drum ingredients.
- 11) Place the air operated mixer in the 30 gallon drum and clamp it to the outside of the 55 gallon drum.
- 12) Start the mixer and mix for two minutes.
- 13) Slowly add 160 lbs. of Envirostone cement to 30 gallon drum with the mixer running.
- 14) Allow to mix for 10-15 minutes.
- 15) Stop mixer. Remove it from the drum.
- 16) Using the highlift, remove the completed 55 gallon drum from the catch basin and place it away from the work area.
- 17) Allow completed drum to cure for 24 hours before permanently sealing drum.
- 18) Repeat steps 3 through 16 to continue the solidification process.
- 3. Drum Packaging and Marking
 - a. Metal Operators, Production Control, will package the solidified solvents. The Operators shall:

| Review Cates | | | | |
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| and Initials | | | | |
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FUELS MANUFACTURING DEPARTMENT OPERATING PROCEDURES

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Title

SOLIDIFYING AND PACKAGING OF WASTE SOLVENTS

ARCOLUCTION CONTROL

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- 1) Fill the remaining space in the 30 gallon inner drum with absorbent material.
- 2) Seal the 30 gallon drum with lid, lock ring, and bolt.
- 3) Fill the remaining space above the 30 dallon drum to the top of the 55 gallon drum with absorbent material.
- 4) Attach the lid, lock ring, bolt and lock nut to the S5 gallon overpack drum.
- 5) Torque the boit and lock nut to 40 lbs. minimum.
- 6) Weigh each drum for gross weight.
- 7). Label each drum with the following information in the order given.

NOTE: All stenciling shall be 2" high, contrasting color to background, durable, water and corrosion resistent for the service life of the container.

- a) Information stenciled on the <u>lid of drum</u>.
 - (1) Point of Origin, "UNC/300".
 - __(2) Gross weight, "G.W. xxx lbs.".
 - (3) Container 1.0. number, "I.D.-SP-xxx".
- b) Information stenciled on the side of drum.
 - (1) Point of Origin, "UNC/300".
- (2) Gross weight, "G.W. xxx lbs.".
 - (3) Container I.D. number, "I.D.-SP-xxx".
 - (4) D.O.T. hazard class, "ORM-A".
 - (5)-0.0.T. shipping name, "Tetrachloroethylene".
 - (6) D.O.T. Hazardous Material I.D. number, "UN 1897".

NOTE: If the gross weight exceeds 1120 lbs., the words, "Bottom Tier Only" must be stenciled to the side of the drum.

| Review Dates | | | ~ |
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| and Initials | | | <u> </u> |
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| Sucarman IL & & which is | the figures 11-15-63 | Marieger, Proguetian Control | - 11/1 × /33 |

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FUELS MANUFACTURING DEPARTMENT OPERATING PROCEDURES

SOLIDIFYING AND PACKAGING OF WASTE SOLVENTS

PRODUCTION CONTROL

- 8) Inspect each drum and for the following information:
 - .a) Drum identification number.
 - b) Contents of drum.
 - c) Gross weight.
 - d) Date of operator inspection.
- 9) Complete a "Waste Control" form for each drum.

 NOTE: The form will have an assigned number. This number shall be the container I.D. number.
- 10) Contact a Radiation Technician to survey the drum and complete their portion of the "Waste Control" form.
- 11) Attach the "Waste Control" form to the drum. See attachment III for example of "Waste Control" form.
- 12) Give the pink copy of the "Waste Control" form to the Supervisor, Production Control.
- 13) Transport the drum to an approved storage area designated by the Supervisor, Production Control.
- 4. <u>Cleanup and Storage of Equipment Used in Solidification Process</u>
 - a. A Metal Operator, Production Control, shall cleanup the work area. He shall:
 - 1) Seal any open drums of waste solvent.
 - 2) Clean up the catch basin if any spills have occurred, using absorbent material.
 - NOTE: Any used absorbent material may be saved in a spare 30 gallon drum and later placed in a solidification drum with other absorbent material.
 - 3) Clean mixer shaft to prevent hardening of material.

| Advictory Casted | · | |
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FUELS MANUFACTURING DEPARTMENT OPERATING PROCEDURES

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SOLIDIFYING AND PACKAGING OF WASTE SOLVENTS

PRODUCTION CONTROL

4) Place the electric solvent pump and mixer in a spare 55 gallon drum.

WARNING:

A Radiation Technician must be contacted and a survey of personnel and equipment taken before leaving the radiation zone.

₩₽#0096P

Amount Cores
and Initials

Preserved on J. J. J. Light 1/12/55 Accorded by

Supervisor 7. Local 1/12/55 7K Manufall 11-12-25

Manager, Production Corners

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FUELS MANUFACTURING DEPARTMENT OPERATING PROCEDURES

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SOLIDIFYING AND PACKAGING OF WASTE SOLVENTS

PRODUCTION CONTROL

ATTACHMENT I

| CONE | DITIONAL RAI | DIATION RE | LEASE |
|---------------------------------------|--------------|-------------|-----------|
| Instructions: | | -· | - |
| | | - · | |
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| | | | - |
| Date: | §y: | | |
| BL-6700-133 (10- | 77) | Rediction M | enitoring |

(Actual size 2" x 4", yellow-in-color)

| Review Cases and Increas | | | |
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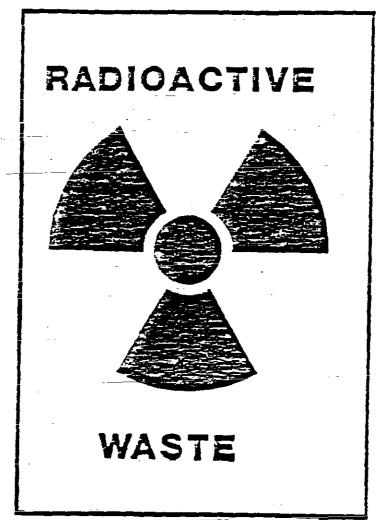
FUELS MANUFACTURING DEPARTMENT OPERATING PROCEDURES

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SOLIDIFYING AND PACKAGING OF WASTE SOLVENTS

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ATTACHMENT II



("Radioactive Waste" label, 5" x 7" in size)

| Advisor Catas and Invisor | | | | | , | |
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SOLIDIFYING AND PACKAGING OF WASTE SOLVENTS

ATTACHMENT III

| PRODUCTION TO THE PRODUCT OF CONTAINED TO THE SECOND OF THE SECOND OF CONTAINED TO THE SECOND OF TH | Hamilard Exphanism Devilopment Laboratory | | TE CONTROL | HEDL PML |
|--|--|---|-----------------------------------|--------------------------------------|
| *Type & Size of Consumer If not Sentand | | | (manufacture) = 1 | VOLUME & COMPOSITION S form S Month |
| RABIATION SURVEY INFORMATION ON CONTAINER | Profito | Notes | Weeplet | % Oww |
| Smarter Compression □ <2200 c/m/100 cm ³ seta-classes □ <2700/m/100 cm ³ alpha | ALGIATION SURVEY INFORMATION Mes Commes | <u>ON CONTAINER</u> * 6* monito <2200 c/m/100 cm² seta | # 7 □ <0.5 mP/m # # 601/m/100: | m ¹ acma |

(Actual size 8-1/2" x 5-1/2", 2 copies multicolored)

| Agreew Cates | | | | - |
|---------------------------|---------|----------|-----------------------------|----------|
| and install | | | | |
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BURIAL COMPLIANCE CHECKSHEET FOR RADIOACTIVE SOLID WASTE MATERIAL

| | | | | _ | 3 | ≢ | 1 | A | - | 7 | G | = | 1 | | | _ | | |
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Waste Processing & Disposal Unit Approval Signature

Waste Generator: <u>UNC Nuclear Industries</u>

Waste Title: Non-Transuranic Contaminated Solidified Perchloroethylene

Storage/Disposal Container: DCT Spec 17C/17H Painted Steel 55 Gal. Drum

Reference: RHO-MA-222, Rev. 2 (Unclassified), July 1984,

D.F.Belgrair, "Hanford Radioactive Solid Waste Packaging, Storage and Disposal Requirements"

Waste Type: [] Classified

[X] Non-Transuranic

[] Transuranic WIPP Certified

[] Transuranic WIPP Un-Certified

Disposal

Z'ype:

[X] Scheduled

[] Retrievable Storage

[] Non-Scheduled

[X] Contact Handled

.F J One-Time Only

[] Remote Handled

[X] Direct Burial

Transport

Criteria:

[] U.S.Department of Transportation

[X] Waste Generator

[] Rockwell Transport Approval Number:

Transpert

Calegory: - CX1 Low Specific Activity

[] Limited Quantity

[] Type A

[] Type B

[] Highway Eoute

Controlled Quantity

A. WASTE DESCRIPTION



3-12-7G-1

Rockwell Storage &

Disposal Approval

Number

page 2 0: 4

1. Waste Contents Included:

| Yes | No | | Yes | Νο |
|------------|-------------|---|---------------------|--|
| [] | ex 1 | Miscellaneous-Solid Waste | £ 3 | CXI Tritium |
| · [-] | (X) | Animal Carcasses | [] | CXI Alkali Metals |
| c 1 | cxi | Unabsorbed Liquid Organics | £ 3 | CXI Asbestos |
| c 1 | [X] | Ion Exchange Columns | £ 13 | [X] Lead Shielding |
| C 1 | cxi | DOT Class B Poison: | t – 1 | _ IXI_GasGenerating Potential |
| t 1 | txi | Heat Generating Potential (Greater than 0.1-watts/of) | [X] | î î Hazardous Material Co-contamination |

(X) () Other: Solidified Perchloroethylene with Beryllium

Note: The following are prohibited: Free inorganic liquids, incompatible materials, pyrophorics, explosives, unreacted alkali metals, and unvented gas cylinders.

- Physical Description of Waste: Perchloroethylene and Beryllium solidified with U.S.Gypsum emulsifier and Envirosione.
- 3. Radionuclide Activity Description

Non-Transuranic: BOT Low Specific Activity concentrations of Uranium and Beryllium.

Transuranie: Less than 100 nCi/gram waste matrix.

- 4. Hazardous Material Co-contaminant Description: Perchloroethylene (Tetrachloroethylene) and Beryllium.
- 5. Maximum Allowable Fissile Quantity: Less than 1 gram/drum
- 6. Void Space Filler Material: Vermiculite, diatomite or other inert absorbent material.

SAMPLE

3-1A-7G-1 Rockwell Storage & Disposal Approval Number

| 1. | Container Name: DOT | Spec. 17C/17H Painted Steel 55 Gal. Drum |
|------------|-----------------------|--|
| | | • |
| Ž . | Drawing or Specifica | tion Number: DOT Specification 17C/17H |
| | - | |
| 3. | External Dimensions: | 24" OD × 35" H |
| | | |
| | Birman Halaman | 7.4 of per container |
| 4. | Disposer volume. | |
| | • | |
| 5. | Maximum Gross Weight | : 1450 154 |
| | | |
| 6. | | Steel 55 gallon drum manufactured in |
| | | DOT specification 17C or 17H with a |
| | • | id locking ring bolt is torqued to |
| | 40 ft-lbs, and | a lock nut is installed. |
| | | |
| | | ckaging: Solidification mixture may be |
| | | in 5-to-30-gallon-steel containers. |
| | | s are sealed and surrounded within a by absorbent material and the drum sealed. |
| | 33 derion diam | by absorbent material and the drum \$4214d. |
| | • | • |
| 8. | Closure Mechanism: G | asketed lid with looking ring. |
| | | |
| 9. | Maximum Allowable | . Less than 200 mR/hr (Contact) |
| | Radiation Levels: | N/A (Other) |
| | | |
| 10. | Maximum Allowable | Less than 220 d/m/100-sq cm-slaha |
| | Surface Contamination | n: Less than 2200 d/m/100 sq.em beta-gamma |
| – | | |
| | Same in a district of | • |
| * * • | Required Labels: | Point of Origin (eg.UNC 300) |
| - | | Gross Weight (eg. GW XXX LES) |
| | • | Radioactive |
| | | "BOTTOM TIER ONLY" (Only required if gress |
| | | weight is 1120 lbs or greater) |
| | | Additional DOT Hazard Class (eg. ORM-A) |
| | | Additional DOT Proper Shipping Name (eg. Tetrachloroethylene) |
| | | teg. Petrionioroethytene) Additional BCT Hizzrdous-Miterial—ID-Number |
| | | |

Rockwell Storage & Disposal Approval Number

12. Returnable Transport Overpacks: None.

Note: The Waste Generator must send a current Certificate of Compliance (COC) and Safety Analysis for Packaging (SARP) for each type of Returnable Transport Overpack to Rockwell prior to the initial shipment and each time these documents are revised.

C. OTHER REQUIREMENTS

1. Administrative Controls: None.

(1) Solidification method shall be as follows:

Slend 1/2 gallon of water and 3/4 to 1 pint
of U.S.Gypsum emulsifier to each 1 gallon of
Perchloroethylene to form a uniform emulsion.

Add 10 to 11 pounds of Envirostone per each
gallon of perchloroethylene with continuous
mixing. Allow mixture to cure for 24 hours
before sealing drum.

2. Bockwell Storage/Disposal Instructions:

- --- (1)- #aste-may be-handled by forktruck and stacked.

FOR RADIOACTIVE SOLID WASTE MATERIAL

SAMPLE

3-1A-7L-1

Rockwell Storage &

Disposal Approval

Number

01-21-86 Date

Rockwell Solid Waste Processing & Disposal Unit Approval Signature

Waste Generator: UNC Nuclear Industries

Reference letter #29464 dated 12-16-85

Waste Title: Low Level Solidified Mixed Chemical Waste

-Storage/Disposal-Container: BOT Spec 170/17H Painted Steel 55 Gal. Drum

Reference: RHO-MA-222, Rev.3 (Unclassified), August 1985,

T.E. Pauly, "Hanford Radioactive Solid Waste Packaging, Storage and Disposal Requirements"

Waste Type: [] Transuranic [X] Low Level

Disposal

Type: [X] Burial [] Retrievable Storage

[X] Scheduled [X] Contact Handled

[] Routine [] Remote Handled

[] One-Time Only

Transport

Criteria: [] U.S.Department of Transportation

[X] Waste Generator

[] Rockwell Transport Approval Number:

Transport

-Category: - [X] Low Specific Activity [] Limited Quantity

[X] Type A [] Type B [] Highway Route
Controlled Quantity

A WASTE DESCRIPTION



3-1A-7U-1 Ecckwell Storage & Disposal Approval Number

1. Waste Contents Included:

| Yes | No. | Yes | No | |
|-------|--|---------|-----|-----------------------------|
| ָנ ָז | [X] Miscellaneous Solid Waste | £ 1 | EX3 | 3 Tritium (>20 mCi/M) |
| [] | [X] Animal Carcasses | [] | [X] | Alkali Metals |
| E 3 | [X] Unabsorbed Liquid Organics | ľ i | [X] | Asbestos |
| | | | EX3 | Lead Shielding |
| (1 | [X] Significant Concentrations Of C-14, Xr-85, To-99, I-129 | t j | [X] | Gas Generating Potential |
| 63 | [X] Heat Generating Fotential (Greater than 0.1 watts/cf) | CXI | [] | Radicactive Mixed Waste |
| (X) | [] Other: Solidified Mixed Chemics | I Waste | | |
| • | St. 4 Mile Authorization on State 4 | _ | | |

Note: The following are prohibited: Free inorganic liquids, incompatable materials, pyrophorics, explosives, unreacted alkali metals, and unvented gas cylinders.

--- 2....Physical Description of Waste:

Ethyl acetate and bromine solidified in small metal
containers.

------3. Radionuclide - Activity Description

Non-Transuranic: DOT Low Specific Activity concentrations
of various radionuclides including uranium.

Transuranic: Less than 100 nCi/gram waste matrix.

- -4. Radioactive Mixed Waste Hazardous Constituent Description: Perchloroethylene, trichloroethylene, trichloroethane, ethyl acetate and bromine.
- ___5. Maximum Allowable Fissile Quantity: Less than 1 gram/drum.
- 6. Void Space Filler Material: Soil, vermiculite, or other inert materials.

3-1A-7L-1 Rockwell Storage & Disposal Approval Number



page 3 of 4

| i. Co | ntginer Name: <u>DO</u> | T Spec. 17C/1 | 7H Painted St | eel 55 Gal. | <u>Drum</u> |
|--------|---|----------------------|----------------------|--------------|-------------|
| 2. Dr | awing or Specifi | cation Number | : <u>DOT Specifi</u> | cation 17C/1 | <u>7H</u> |
| 3. Ex | ternal Dimension | s: <u>24" ŌD x</u> | 35" H | | |
| 4. Di | sposal Volume: _ | 7.4 cf. De | r container | | |
| 5. Ma | ximum Gross Weig | ht: 900 15s | | | |
| | neral Descriptio | | | | |
| | accordance wi | <u>th DOT</u> specif | ication 17C o | r 17H with a | 4 mil |
| | (nominal) or | thicker polye | thylene liner | and a gaske | ted lid. |
| | Lid locking r | ing bolt is t | orqued to 40 | ft-lbs, and | a lock |
| | nut is instal | 1 ed . | | | |
| 7. ₽• | quired Internal | Packaging: So | lidification | mixture may | be placed |
| | | to 30 gallon | | | |
| | | ntainer is th | | • | |
| | | on drum. Abso | | | |
| | | to fill the | | | lyethlyene |
| | lined drum. | The liner and | drum are the | n sealed. | • |
| S. Cl | esure Mechanism; | _Gasketed_lid | withlecking | ring. | |
| 9. Ma | ximum Allowable | Less tha | n 200 mR/hr | (Con | tact) |
| Â. | diation Levels: | N/A | | (Oth | er) |
| 10. Ma | ximum Allowable | Less tha | n 220 d/m/100 | sa cmainha | |
| | rface Contaminat | | | | |
| | | | | <u> </u> | -44000 |
| li. Re | quired Labels: | | | | |
| | -Top and side | : Point of Or | igin (eg.UNC | 300) | |
| | -Top and side | | | | |
| | -Side only: | | | | lent) |
| | -Side only: | Ädditional | DOT Hazard Cl | ass label to | 7 |
| | | Corrosive M | | | - |
| | -Side only: | EPA Hazardo | us Waste Stic | kers as requ | ired: |
| | • | "F003. WT | 02, Ethyl Ace | tate" | |
| | | "5002. DW | . Bromine Sol | ution" | |
| | | "UZ10, Pe | rebloreethyle | ne" | |
| | - · · · · · · · · · · · · · · · · · · · | "UZ28, Tr | ichloroethyle | ne" | |
| | | "U226, Tr | ichloroethane | . 11 | |
| | | Use the BCC | number for t | he Manifest | Document Ne |
| | | | | | |

B. WASTE PACKAGING SYSTEM (Continued)

Rockwell Storage & Disposal Approval



page 4 of 4

12. Returnable Transport Overpacks: None.

Note: The Waste Generator must send a current Certificate of Compliance (COC) and Unloading and Handling Procedures for each type of Returnable Transport Overpack to Rockwell prior to the initial shipment and each time these documents are revised.

C. OTHER REQUIREMENTS

1. Administrative Controls:

- (1) The chemical waspe mixtures shall be completely solidified and inspected after the curing time for any leached fluid. No free liquids shall be allowed.
- (3) The name of the hazardous constituents and quantity present must be identified on each corresponding Solid Waste Burial-Record-Low Level form.
- (4) The chemicals forming the mixture shall be compatible, that is, must not react dangerously with each other, be decomposed by or ignited by the contaminated waste.
- 2. Rockwell Storage/Disposal Instructions:
 - ... (1) Waste may be handled by forktruck and stacked.

| | kwell- Hanfo | ra Operat | IONS - | <u>></u> ∧ | | WASTE BU | THIME NE | -UHU - | - LOW LE | |
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| Remerk | ls | | | | | 2. The wa | 1 by a Property ste package de: | Disposel F eription by | Request and de plow is comple | estribed below terand the v |
| | IOE | | | | | | oforms to RHC sheet (BCC). | -MA-222 a | and the approvi | ed Buriel Co |
| Signatu | re - Acceptance | · | | Qate O | 0 100 | 3. The cha | rge code is corr | ect. | | |
| Simatu | Signature - Burret | | | 2-28-1986 | | 1 | R | 4.0 | | 7 26 |
| 314118111 | re - gurrer | | | | | Sleggerer M. Bushing 2-28- | | | | |
| WAST | E-DESCRIPT | ION | | | | | ER INFORM | | | |
| COMI | BUSTIBLE MAT | ERIALS | NONCOMBU | STIBLE M | IATERIALS | Quantity & N | ame | | | Henford Si |
| - | roducts | 94 | Giass | | 9% | | | lon | Finerboard (18" × 18" | |
| Plastic | | * | · Concrete | | * | 1 | | | | _ 110 X 10 |
| Cloth | | % | Stainless Stai | | l ω ₃ | | Other: | | | |
| Rubber | | ٠, | Other Metals | | 120% | SCC Approva | | | - Package | سنيب بر |
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| | HAZAR | DOUS/CORE | OSIVE CONS | TITUENTS | | / | <u> </u> | | -#/A | |
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| 2. | | | | | 165 | WASTE CA | TEGORIES: | Remark | | |
| | Perchloroethylene | | | • | | . 🗆 sw | | | | : .= |
| | Trick Lorge there | | | T. 995 | +65- | CE CE | SS SS | - 54 | - W-09 | U |
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| 7 | | · . | | | | Thermal Pow | er: | | | |
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| | | | - | 64016A | 071V7 40A | Thermal Pow | er: e/ft ³ or less Other | | | |
| | | | | RAD!ŌA | CTIVE MA | Thermal Pow 2 0.1 w | or: //ft ³ or less Other | | | |
| 7 | | IANIC AND | | RAD!OA | | Thermal Pow | or: offt ³ or less Other ITENT SURANIC | | | |
| Element | TRANSUR | RANIC AND | MOINEBU | RAD!ÓA | Torgi Siement | Thermal Pow 2 0.1 w | Other UTENT SURANIC Grams or | | | |
| 7 | TRANSUR | | MOINEBU | RAD!OA | 70.00 | Thermal Pow 2. 0.1 w TERIAL CON | Other UTENT SURANIC Grems or Curies | | | |
| Element | TRANSUR | otopic Oistnoo | MOINEBU | | Siement JVeight 4. 3 | Thermal Fox | Other UTENT SURANIC Grams or | | | |
| Element 4 23 5 | TRANSUR | otopic District | MOINEBU | | Torpi Siement Weight | Thermal Fox | Other UTENT SURANIC Grems or Curies | | | |
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| Element 4 23 5 | TRANSUR | otopic Oistnoo | MOINEBU | | Siement JVeight 4. 3 | Thermal Fox | Other UTENT SURANIC Grems or Curies | | | |

DISTRIBUTION: White - SWPQU 2750-E/200 E Canary - TFS 272-W/200 W

54-3000-581 (7-E

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| · · · · · · · · · · · · · · · · · · · | | 6-85 | 3, et 3 |
| INDUSTRIAL SAFETY MAI | NUAL | Supercodes Issue Cates | 12-83 |
| HAZARDOUS WORK PERMITS | lamena äv | INDUSTRIAL SAFE | ŢΥ |
| | PENDIX A | | |
| Area 300 81dg. 394A Date | 3-4-86 Shift | Pary | |
| Description of Jab | | | |
| | | | |
| Associated Hazards | | | - |
| toxic chemicals ## electrical ## flammables/explosives ## confined space ## asbestos | one person elevated high tem n ₄ excavati y ₄ hazardou other | on s atmosphere | 90 lbs. |
| Protective Equipment Requirements | | | |
| canvas gloves shoe rubber gloves rubbe coveralls chemi acid suit face hood csafet | r boots cal googles | ear protecti full face ma supplied air safety belt/ other | sk resp. |
| Special Instructions: | <i>;</i> | | |
| Approvals: La Relation Job Supervisor | <u>-</u> | Leff Clina Industrial Sa | und: 3/3/86 |
| Signatures of Personnel Assigned | | | • |
| Name PR:# 110 100 5977 59716- | Date(s 3-4-87, 3/4/8- |) worked | |
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| 1007-5625 | |
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| | FI | JELS MAINTENANCE WO | RK AUTHORIZAT | 10N 030 |
|--|--|--|---|--|
| · | Lob Title Disposition of Solvent | Evapora | Date 10/ | 30/85 85-2510 |
| ٠. | Originator | Section | | Building |
| | J. K. Marshall | Process Enginee | ring | 3707D |
| | Description Of Work: The loa | d lugger which was used | as the waste se | olvent evaporator: |
| | located east of the 33 | 4 building, needs to be | cut up and plac | |
| == | = <u>CAUTION</u> :The high tem | - | | Turney may benefit |
| - | - i | | | |
| ্ৰী | į | orinated solvents into special instructions | onosgene gas. | see attached Hazard |
| | How Discovered: | | | |
| and the second | | | | |
| 1807 262216 | Cost Center -15 - 600 | Activity Task- | | J.R. No. |
| The state of the s | Equipment No. 0 | AL P | Priority / 2/1 | Procedure No. |
| | | REVIEWED BY: | | APPROVED BY: |
| | Fuels Engineering Industrial Sat | W. 141 1 1/1/2010 | Other N/+ | W. H. Clark 12-17-8 |
| , | Fuels Production/Production Control Suite Equipment Released | Equipment Accepted LE Manula I | Material Local Bldg, No. 3-5-86 Sin No. | tion: |
| | Name Oate | Name () | Date Tagout Nos.: Fuels Prod./P | rod. Control Fuels Maintenance |
| | | | NA | N/A |
| | | Name | Date | |
| | Name Oate | Name | Date | |
| | Work That Was Done: Explain: | LOAD LUGGER + | - ALLMINU | n LID FOR |
| • | SISPOSAL Den | <u> 3-4-86</u> | | |
| | <u> </u> | HANDLING OF | CUT UP P | reces Phones |
| | | The second of th | | WIRGAS W |
| | | The second secon | | 2446 |
| · · · - · · · · · · · | How Failed: | | | |
| · · · · · · · · · · · · · · · · · · · | Post Repair Testing Requirements: | CONTACT TEX MAN | SHACL GOZ | ACCEPTANCE 3 |
| | Work Completed: Fuels Maintenance Supervisor Signatures: | 1/// | A. | 335-86 |
| | | Name - State of the Park | | The state of the s |
| j. | The state of the s | | | |
| - | | Name Name | | - 0 |

| Oisposition of So | Ivent Evaporat | MPI | |
|--|---------------------------------------|---------------------------------------|----------------------------------|
| ocation: Adiacent to 33 | 4 Building | | |
| escription of Job: Cut | | er used for stor | age of waste solvent |
| place in a 4' x 4' x | 8' burial box. | <u> </u> | |
| | | | |
| | | | |
| | | | |
| - | | EVEL EVALUATION | |
| • | Minor (Control Factor 1-7) | Moderate (Control Factor 1-4) | Major (Control Factor 1-2) |
| Personal Injury | | 2 | |
| Equipment Damage | NA | | |
| Violation of Nuclear Safety Specification | NA | | |
| Fire from Pyrophoric | - NA | | |
| Environmental Release | NA . | | |
| Specific Hazards Identifi | lad. | 1 | <u></u> |
| Specific negation tomicity | 1941 | · · · · · · · · · · · · · · · · · · · | |
| | | | |
| | | | |
| Evaluator: J. K. Marshal | , JK Moulall | Date: 13 | |
| Approvals: | | Date: /// | 8/85 |
| | · · · · · · · · · · · · · · · · · · · | Date: | |
| | | Date: | |
| | <u></u> | . Date: | · |

ATTACKENT I

| Document or Procedure Num | bor andran | | |
|---|-----------------------------|---|----------------|
| Disposition o | f Solvent Evan | orator | |
| Location: Adjacent to 3 | 34 Building | | |
| - | | ugger used for storage of wa | ste solvent |
| and place in a 4' x 4' | | | |
| | <u> </u> | | |
| <u></u> | | | |
| Potential Associated Haza | e <u>rds</u> - | | |
| toxic chemicals release | <u>Yes</u> (1) | radiological work | No (2) |
| flarmables/explosives | No | high temperature | Yes (3) |
| asbestos material | _No_ | hazardous atmosphere | <u>Yes</u> (1) |
| nuclear safety | <u>No</u> | pyrophoric material | <u>No</u> |
| solid, liquid or gaseous release to the enrivonment | <u>Yes</u> (1) | Electrical Shock | No |
| rotating equipment | _No_ | Use of Compressed Air Welding (eye protection | No Cui |
| | | of item. If "Yes" the spec that hazard is to be cont | |
| | • | tive Clothing Requirements | |
| | | n Monitoring has investigate | |
| ruled that an RWP is no | t necessary. | (3) Use proper caution in op | eration |
| of cutting torch. | · | | |
| | | | |
| | | x Mamball | - |
| Hazard Level Evaluator | J. K. Marshall [©] | Date: 11/1/85 | |
| Approval: | | Date: 11/8/85 | |
| Section | Маладег | | |

Hazard Analysis Checklist, Page A DI

(1) Although the solvent evaporator has been cleaned as thoroughly as possible, some residual perchloroethylene and I, I, I- trichloroethane most likely is present on the load lugger. These solvents can break down at high temperatures into phosgene, a poisonous gas. To protect the cutting torch operator, a full face hood with supplied air is required.

A Rockwell safety group at 200W area has been contacted that can supply a fresh air hood with a welding visor attachment. Since a specific hose type and air pressure is required to use with this hood, Rockwell will also supply an air bottle and cart. Please call one of the Rockwell safety engineers at 3-3761 to schedule use of this system. They will deliver it and provide instruction on its use.

TIE.

INTERMINE WORK CREEK \$200 /HR - 1 MAN

| | TITLE DISPOSITION C | OS SOLVET TEVAPORATOR WA NO. 85-25 |
|----------|--|--|
| | RESPONSIBLE PARTY | PETENSON 3-3 |
| | EHGINEER | EFDA NA |
| | | FRRR FORM NIA |
| ļ | | |
| | · · · · · · · · · · · · · · · · · · · | PROCEDURES SEE HAZARD ANALYSIS |
| | Engineering | PROCEDURES SEE THIS HIGHERSTS |
| İ | • | |
| | Superyisor | TAG OUT A)/A |
| | | RWP N/A |
| | | HAZARD ANALYSIS YES ATTACHETO |
| | | Be PERMIT N/12 |
| S | | BURNING/WELDING PERMIT YES WELD ROD SLIP N/P |
| Marie Co | MRINT. ANRLYST | EXCAYATION PERMIT N/A |
| | (ROUTE FOR APPROVALS | |
| l | ONTA) | |
| | QUALITY FISSURANCE # | * HOLD POINTS NO ME 12-11-85 |
| | | INSPECTION SHEET NO MOER 12-11-85 |
| | • | · |
| | | |
| _ | | MATERIALS REQUIRED |
| | | |
| | FM MATERIALS | CERT'S REQUIRED N/17 |
| | —————————————————————————————————————— | ACCEPTANCE DOCUMENTS NIA |
| | : | (GREEN TAGS) |
| | Alles 1711 Accumentes | |
| | QUALITY ASSURANCE | SPECIAL HANDUNG |
| | | |
| | * REQUIRES QA DETERMIT | MATTON |
| | | |
| | <u> </u> | 12/2/75 - 12/2/75 - |
| į | • | PLANNING & SCHEDULING DATE |

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BURIAL COMPLIANCE CHECKSHEET FOR RADIOACTIVE SOLID WASTE MATERIAL

3-58-1A-1

ROCKWELL Storage &
Disposal Approval
Number



| Waste Genera | ator: | UNC NUC | LEAR INDUS | TRIES | | |
|------------------------|-------------|-------------|-----------------|-------------|-------------|----------------------|
| | | Reference | | | ea | File #15 |
| _weste-Title | : <u> L</u> | ow-Level-M | iscellaneo | us Racioad | tive ŝolio | . Waste |
| Storage/Dis | 00581 | Container | : <u>UNC 4X</u> | 4x8 Pivwoo | od Box | |
| Reference: | T. R. | | anford Rad | ficactive : | Solid Wast | |
| • | - 4416 | | | | | |
| waste Type: | C 3 | Transuran | ic | t x | Low Leve | I |
| | [X] | Unclassif | i ed | c : | Classifie | o d |
| | | | | | | |
| Disposal Type: | txi | 9uria! | | c : |] Retrieval | pie Storage |
| | [X] | Scheaulea | | ţx | Contact | Hang I ed |
| | [] | Routine | | t.x | . Remote H | and!ed |
| | [] | One-Time | only" | | | |
| Transport Approval: | [] | U.S.Depar | tment of T | Fransporta | tion | |
| | | _ waste-Gen | erator | | | • |
| | ε 1 | ROCKWELL | Transport | Approva: | Number: | |
| • | | | | | | |
| Transport Category: | [X] | Low Speci | fic Activi | ity (x |] Limited (| Quantity |
| , | [X] | Type A | [] Type | | - | Route ed Ouantity |

3-58-1A-1 ROCKWELL Storage & Disposal Approval Number



1. Waste Contents Included:

| Yes | No | Yes | NO | |
|----------------|---|----------------|--------|-----------------------------|
| [X] | [] Miscellaneous Solid Waste | C 1 | [X] | Tritium . (>20 mCi/cu. M) |
| t 1. | [X] Animal Carcasses | C 3 | [X] | Alkali Metals |
| c 3 | [X] Unapsorbed Liquid Organics | txi | E I | ASDestos |
| - _[] _ | (x) Jon Exchange Resins | c 1 | [X] | Lead Shielding |
| £ 3 | CXI Significant Concentrations of C-14, Kr-85, Tc-99, I-129 | <u>-</u> [-]- | - [X]- | Gas Generating Potential |
| | [X] Heat Generating Potential "" (Greater than-0 | | txi | Radioactive Mixed Waste |
| r 1 | [X] Other: | | - | |

Note: The following are prohibited: Free inorganic liquids, incompatible materials, pyrophorics, explosives, unreacted alkali metals, and unvented gas cylinders.

- - 3. Radioactive Material Description

Non-Transuranic: Up to and including DOT Type A quantities of various radionuclides including mixed activation and fission products.

Fransuranid: Less than 100 nCi/gram wasta matrix.

4 ... Radioactive Mixed Waste Hazardous Constituent Description:

None

- 5 Maximum Allowable Fissile Quantity: 15 grams per container.
- Void Space Filter Material. Soil, vermiculite or other inert material.

Rockwell Storage & Disposal Approval Number

SAMPLE

1. Container Name: ____UNC_4'x4'x8' Plywood

| 2. | Drawing or Specification Number: <u>H-1-42701</u> |
|------------|--|
| 3. | External Dimensions: 8'L x 4'W x 4'5-1/2" H |
| 4. | Disposal Volume: 143 cu ft per container |
| 5 . | Maximum Gross Weight: |
| 5 . | General Description: Wooden box constructed of 3/4" fire-retardent plywood with 2x4 inner framing and glued and nailed joints, and 1 1/4" wide steel banding. Box is mounted on 4x4 wood skids for forktruck handling. |
| 7. | Required Internal Packaging: None required. |
| | |
| 3. | Closure Mechanism: Box lid is glued and nailed in place, and steel banding is installed. |
| 9. | Maximum Allowable Less than 200 mR/hr (Contact) Radiation Levels: Single points to 1 R/hr with (Other) Administrative controls on bade 4 |
| 1Ô. | Maximum Allowable: Less than 220 d/m/100 sq cm alpha Surface Contamination: Less than 2200 d/m/100 sq cm beta-gamma |
| 11. | Required Labels: Top and side: - Point of Origin (eg. UNC 100N) - Gross Weight (eg. GW XXX 10s) |
| | |
| | -Container ID (eg. H-1-42701) |
| | -Grams Fissile Material (only required if 1 gram or mo- is present) |
| | |
| | |

Rockwell Storage & Disposal Approval

SAMPLE

11. Required Labels (continued): If aspestos is present mark 2 sides wi

CAUTION

Contains Aspestos
Avoid Opening or
Breaking Container
Breatning Aspestos is Hazardous
to your Health

12. Returnable Transport Overpacks: None

C. OTHER REQUIREMENTS

1. Administrative Controls:

- (1) The container shall be inspected to assure there has been no breach of containment during loading.
- (3) Containers with not spots on more than one side shall be pre-rigged for grane unloading and shall not be sent in the same snipment_with_forktruck_unloaded or-other-contact handled containers.
 - (4) Rockwell shall be notified of containers with hot spots during scheduling for disposal.
 - (5) A single Solid Waste Burlal Record-Low Level form (Rockwellform:54=3000-534) may be-used-fer-containers-with-like content in the same snipment.

-- 2 -- Rockwell-Storage/Disposal information

- (1) Waste may be handled by forktruck or crane (depending upon radiation levels) and may be stacked.
- (2) Use other containers to shield those with not spots.
- (3) Sackfilling should be completed prior to accumulating 180 grams fissile material in the trench or as required by applicable procedures and specification.

| | | n n / | | | | | | | | سار ز |
|------------------|---------------------------------------|---------------------------------------|--------------|-------------------|----------------------------|-------------------------|-----------------------------------|---------------------------|--|------------------------------------|
| Rockv | veil | | | | SOLID | - | | | LOW LEV | フクスム |
| USE ALAC | EK BALL PO | INT PEN OF | TYPE | | | SWER NO. | 3/3 | - UN | 6-86-4 | , |
| DISPOSA | AL SITE | | | in umprend | | WASTE GE | NERATOR: | UN | C. | |
| Area _ | | Burnal Grou | nd No. | Trench No. | | Charge Cour | - W - 23° |) (A | CE Authorization | NOA |
| 200 | | 3-, | A-E | 5- <i>Ĕ</i> | | Address Phon | • | ره 3/ | | |
| Caisson No | Î/ | | | | | <u> </u> | | , | | |
| | / // - | Enging Coo | roinates | w <u>7659</u> | | | | | | |
| Remerks | | N <u>- 4</u> C | <u> </u> | w <u>7660</u> | 20_ | documented 2. The wa | l by a Property ste package de | Disposei I scription b | y is included in the Request and described is complete. | ribed below. and the weste |
| S: | - Acceptance | · · · · · · · · · · · · · · · · · · · | | D400 | | arice Checks | sheet (BCÇ). | | and the approved | BRUSE COMPH- |
| | | Luahe | - مرز | 7-//- Date | 86 | | rge, code is con | | | |
| Signature | | ر کر سالور | 7. | Cate | 10, | | 7 M.B. | aliz- | | 7-11-56 |
| | 7-41 | Dis | 1 un | 217-1 | 4-86 | | • " | | · | Date |
| WASTE | DESCRIPT | ION | | | | | R INFORM | ATIUN | | |
| | STIBLE MAT | | | JSTIBLE MAT | 1 | Cuantity & N | lame | 55 Gal | ion i | lanford Standard iberboard Boxe |
| Paper Proc | ducts | 10 % | Glass | | 96 | | | Orums | | 18" x 18" x 24 1 |
| Plastic Cloth | | 20 % | Stainless S | | ٠ | t . | | | 1 Barn | / 60% |
| Rubber | | 94 | Other Meta | | 20% | 3CC Approve | Number | Dose Rat | e - Peckage | 0 / 1 |
| W., | ط | 40 % | A6500 | | 10% | 3-58- | 1A-0 | | mrem/hr at | ('onther |
| | | - v ₀ | | | * | 4 | Langin x Wildin | | 4' | |
| | | % | | | ** | Material of C | onstruction | | <u> </u> | |
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| Total | | 70% | Total | | 30° | Nuclear Irans | iaction No. A | Property | 86-577 | No. |
| | HAZAR | DOUS/CORF | ROSIVE CON | STITUENTS | | | | | | |
| | Nar | me | | Quantity (L | b or Kg) | Volume | , 25° C- + | Gross We | ign: 20,000 | Kilogram |
| | N/A | , . | | 26/A | , | WASTE CA | TEGCRIES: | Remark | :s: · | |
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| | | | | 1 | | Thermal Pov | NC NC | | | |
| | | | | | | | v/ft ³ or less | <i>B</i> = | 17580 - | FNO |
| | | | | | | | Other | - | | |
| | | | | RADIDACT | IVE MA | TERIAL CO | VTENT | <u> </u> | | , |
| | TRANSUR | RANIC AND | URANIUM | | | MARTMON | Grams | <u> </u> | | |
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APPENDIX E

SOIL AND CONCRETE SAMPLING AND ANALYSIS PLAN FOR THE 300 AREA SOLVENT EVAPORATOR

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APPENDIX E

SOIL AND CONCRETE SAMPLING AND ANALYSIS PLAN FOR THE 300 AREA SOLVENT EVAPORATOR

E-1 INTRODUCTION

The Soil and Concrete Sampling and Analysis Plan for the 300 Area Solvent Evaporator (300 ASE) has been designed for the assessment of contamination of surface or near-surface soils and an adjacent concrete pad that originated from the 300 ASE and attendant barrel storage operations. The 300 ASE treated radioactively contaminated dangerous wastes and thus was a mixed-waste treatment and storage facility. The location of the 300 ASE closure area and proximity to other 300 Area facilities are shown in Figures E-1 and E-2. The closure area consists of a part of the concrete pad (333 East pad) adjoining the 333 Building and the soil immediately adjacent to the south end of this concrete.

The 300 ASE operated prior to the effective date of the RCRA regulations. Operations associated with the facility ceased and the evaporator was dismantled prior to the first formal interpretive guidance clarifying the applicability of RCRA to mixed wastes. The specific data/documentation requirements of either RCRA or Ecology's Dangerous Waste Regulations. WAC 173-303 (Ecology 1991), were not implemented while operating or dismantling the 300 ASE. In accordance with the procedures identified in Appendix D, the 300 ASE was dismantled and buried.

E-1.1 CLOSURE STRATEGY

33 ____ The data generated through implementation of this plan will be used to assess the extent of contamination in the closure area that is attributable to the 300 ASE. Based on the evaluation of these data, the facility will be -36 - either clean closed under RCRA or closed in conjunction with the Remedial Investigation/Feasibility Study of Operable Unit 300-FF-2 under CERCLA.

Remedial action for the 618-1 Burial Ground underlying the 300 ASE closure area, at a depth of approximately 4 feet, will be evaluated as part of the 300-FF-2 Operable Unit. The 618-1 Burial Ground was operated from 1944 to 1951 as a low-level radioactive solid waste burial ground which received uranium, other metallic and non-metallic materials, and incidental laboratory wastes.

E-1.2 GENERAL SAMPLING STRATEGY

The strategy for sampling and analysis of both the soil and the concrete has been based on assessments of potential waste discharges using historical information on the storage of spent solvent on the concrete pad, and on the only known spill (onto the soil). Assessments of hypothetical waste discharges have been developed using the physical characteristics of the waste

300 AREA SOLVENT EVAPORATOR UNIT

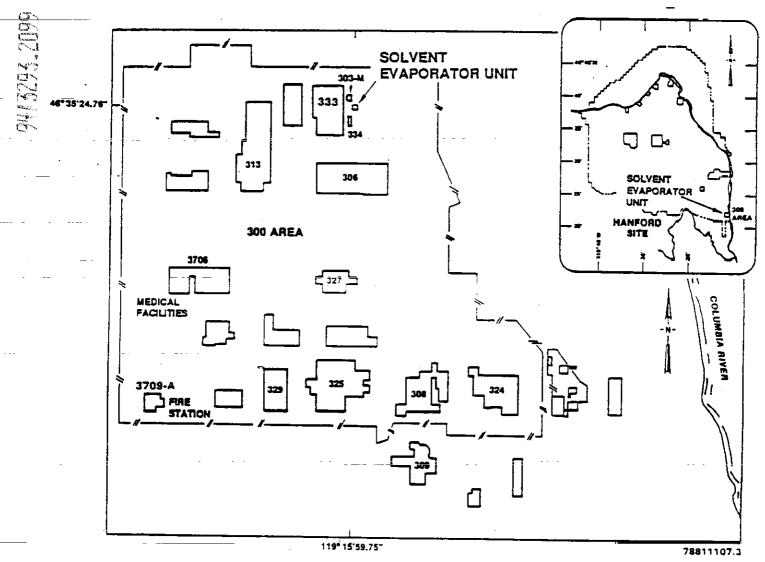


Figure E-1. 300 Area Solvent Evaporator. (78811107.3)

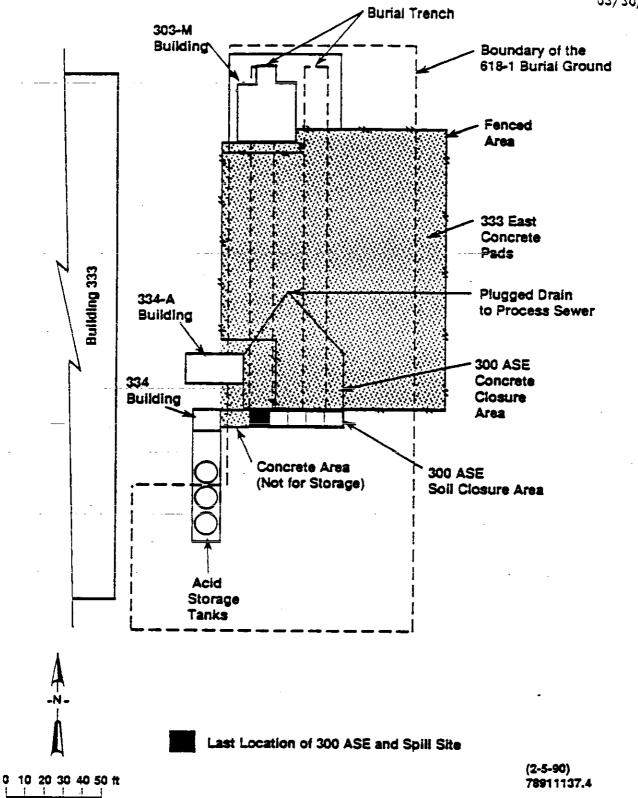


Figure E-2. Layout of 300 Area Solvent Evaporator Closure Area and 618-1 Burial Ground. (78911137.4)

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42 -43 constituents, weather conditions, known properties of the soil and concrete, and the time and location of the known spill (Section E-2). It has been deduced from the most liberal assessment that none of the 300 ASE volatile constituents should now be present either in the soil or in the concrete. This conclusion is, therefore, the technical basis for performing verification sampling of both the soil and concrete.

E-1.2.1 Soil Analytes

Soil analysis will be largely confined to known and suspected waste constituents associated with the 300 ASE. This rationale is justified by the uncertainties associated with the nature of the 618-1 Burial Ground soil cover, the unknown impact of wastes from the underlying 618-1 Burial Ground, and the potential for contamination from other adjacent operations in the immediate area. These waste constituents can be grouped into the following four categories.

- 1. Solvents and organic compounds known to be treated in the evaporator.
- 2. Organic degradation products of the primary organic compounds.
- 3. Inorganic constituents from the degreasing of fuel element materials.
- 4. Inorganic constituents that may have been treated in the evaporator via paint in conjunction with paint solvent.

The specific constituents associated with these four categories are 29 listed in Table E-1. Inorganic constituents having concentrations at or below detection limits in the analysis of the raw-waste solvent (Table E-2) are omitted from the list of constituents to be analyzed. The elements silicon. aluminum, iron, calcium, sodium, and phosphorous also are excluded because they are primary constituents in native rocks and soils and occur at concentrations far in excess (1,000 to 500,000 micrograms per gram) of those in the raw waste (less than 100 micrograms per gram). All additional organic constituents obtained by Methods 8210 or 8240 and 8270 (SW-846) (EPA 1986) will be reported since they are measured concurrently in the analysis and can be used in CERCLA (1980) characterization efforts. Thus, compliance with RCRA regulations will be verified using the constituents listed in Table E-1. The presence of the additional organic constituents (other than those listed in Table E-1) from the closure area and baseline samples, will be regarded as -originating from the underlying 618-1 Burial Ground or other operations in the 300 Area. Likewise, elevated concentrations of inorganic constituents in - 44 - baseline samples will be interpreted as originating from other sources. Any remedial actions for non-300 ASE contaminants will be evaluated in conjunction with the Remedial Investigation/Feasibility Study of Operable Unit 300-FF-2.

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Table E-1. The 300 Area Solvent Evaporator Analytes and Performance Standards.

| Category-Constituent . | | itial n level | Alternative action level | | |
|---|------------|------------------|--------------------------|---|--|
| | Soil | Concrete | Soil Concrete | | |
| 1- 300 ASE primary organic constituents | | , , <u>,</u> | · - · | | |
| Perchloroethylene (PCE) | - a | b | С | С | |
| 1,1,1-trichloroethane (TCA) | a | Ь | С | С | |
| Trichloroethylene (TCE) | a | b | С | С | |
| Methyl ethyl ketone (MEK) | a | b | С | С | |
| Ethyl acetate | a | b | С | С | |
| Dichloromethane (methylene chloride) | a | b | С | С | |
| Petroleum naptha | С | С | - ' | _ | |
| 2- 300 ASE secondary organic constituents (i. | .e., degi | radation p | roducts) | | |
| 1,1-dichloroethylene (DCE) | a | b | С | С | |
| trans-1,2-dichloroethylene (DCE) | a | b | С | С | |
| 1,1-dichloroethane (DCA) | a | a | С | С | |
| 1,2-dichloroethane (DCA) | a | b | С | c | |
| Vinyl chloride | a | b | С | С | |
| 3- Inorganic constituents (related to fuel fa | abricatio | on) | | | |
| Zirconium | a | d | Ь | d | |
| Beryllium | ā | d | ь | d | |
| Bromine | a | d | b | d | |
| Uranium . | d | d | d . | d | |
| Copper | a | d | Ь | d | |
| 4- Inorganic constituents (related to paint s | shop solv | /ents) | | | |
| Barium | a | ď | С | ď | |
| Cadmium | _ a | <u>.</u> | _ C | d | |
| Lead | a | d | c | d | |
| Silver | a | d | c | ď | |

a Concentrations that exceed baseline (local background) threshold levels.

b Concentrations that exceed limits of quantitation (LOQ), i.e., the level above which quantitative results may be obtained with a specified degree of confidence, is defined by the American Chemical Society (1983) as $10\sigma \pm 3\sigma$ at the 99 percent confidence level, where σ is the standard deviation of the instrumental background noise.

c Concentrations that exceed human health-based protection or safety levels (Appendix E-3); contingent on approval by Ecology.

d No action level. Concentration determined for information only.

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E-1.2.2 Concrete Analytes

<u> Concrete samples will be analyzed for the same constituents as soil</u> samples (Table E-1). The action levels for the 300 ASE solvent waste species in constituent categories (1) and (2) identified in Table E-1 are the primary -concrete performance standards for two main reasons: only very small amounts of inorganic constituents, if any, would have accompanied spills or leaks from the 300 ASE and organic waste constituents are the only reliable indicators of _contamination originating from the 300 ASE operations.

Although inorganic constituents from fuel fabrication activities were present in the 300 ASE, they would not have been present in spilled solvent or water in significant quantities based on solubility considerations and concentrations of the raw waste solvent. The analysis of the raw waste as shown in Table 1-2 (Section 1.3.1) indicates that the concentrations for categories (3) and (4) of Table E-1 were largely undetectable (only zirconium was detectable at 2 ppm). Concentrations of any 300 ASE-derived inorganic contamination in a solid matrix such as soil or concrete would, therefore, be significantly smaller. Thus, detectable contamination of the soil or concrete with respect to inorganic constituents originating from the 300 ASE is highly unlikely given the type and extent of known and potential spills.

Past practice operations on the 333 East concrete pad and elsewhere in the 300-FF-2 Operable Unit are known to have involved fuels fabrication-related inorganic constituents. Both the 300 ASE and past practice activities involved the same types of inorganic constituents [i.e., fuel fabricationrelated constituents of the type listed in categories (3) of Table E-1]. However, the 333 East concrete pad is known to be contaminated with inorganic constituents from the past practice activities (Chapter 1.0, Section 1.1.2) in larger amounts than any which could have possibly come from the 300 ASE. Organic waste constituents, which constituted nearly 100 percent of the waste of concern, are therefore regarded as the only reliable indicators of 300 ASE derived contamination because: (1) it would not be possible to discriminate 300 ASE-derived inorganic contamination from past practice derived contamination and (2) any detectable inorganic contamination or contamination patterns are undoubtedly attributable to past practice activities rather than --to-the 300 ASE. Thus, inorganic contamination associated with the 300 East concrete pad is most appropriately handled in conjunction with the 300-FF-2 Operable Unit remedial actions. Ecology's final decisions regarding --40 -the closure of the 300-ASE, however, will be made on the basis of all data.

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Table E-2. Solvent Evaporator Inductively Coupled Plasma-Atomic Emission Spectroscopy Analytical Results (1985).

| 3 | | | | | | | | | |
|------|-------------|---------------------------------------|-------------------------------|--------------------------------|------------------|--|--|--|--|
| 4 | | Detection limit ^a #g/mL | NaOH/Zr ^b μg/mL | KOH/Ni ^c · μg/mL | Average µg/mL | | | | |
| 5 | Aluminum | 0.03 | 6 | 10 | 8 | | | | |
| 6 | Antimony | 0.05 | | | • | | | | |
| 7 | Arsenic | 0.8 | | | | | | | |
| 8 | Barium | 0.002 | | | | | | | |
| 9 | Boron | 0.01 | 5 | 2 | 4 | | | | |
| 10 | Cadmium | 0.004 | | | | | | | |
| 11 | Calcium | 0.01 | 46 | 52 | 48 | | | | |
| 12 | Cerium ···· | 0.04 | | | | | | | |
| 13 | Chromium | 0.02 | | | | | | | |
| 14 | Cobalt | 0.01 | | | | | | | |
| 15 | Copper | 0.004 | | | | | | | |
| 16 | Dysprosium | 0.004 | | | | | | | |
| 17 | Europium | 0.002 | | | | | | | |
| 18 | Gadolinium | 0.01 | | | | | | | |
| 19 | Iron | 0.005 | 6 | 78 | 30 | | | | |
| 20 | Lanthanum | 0.008 | | | | | | | |
| 21 | Lead | 0.06 | | | | | | | |
| 22 - | Lithium | - 0.004 | 4 | 2 | 3 | | | | |
| 23 | Magnesium | 0.06 | . • | _ | | | | | |
| 24 | Manganese | 0.002 | | | | | | | |
| 25 | Molybdenum | 0.01 | | | - | | | | |
| 26 | Neodymium | 0.02 | | | | | | | |
| 27 | Nickel | 0.02 | | | | | | | |
| 28 | Phosphorus | 0.1 | 18 | 25 | 20 | | | | |
| 29 | Potassium | 0.3 | | ND | LU | | | | |
| 30 | Ruthenium | 0.05 | | | | | | | |
| 31 | Silicon | 0.02 | 20 | 28 | 24 | | | | |
| 32 | Sodium | 0.01 | ND | 46 | 46 | | | | |
| 33 | Strontium | 0.002 | 11.5 | 10 | 40 | | | | |
| 34 | Tellurium | 0.06 | | | | | | | |
| 35 | Titanium | 0.02 | | | | | | | |
| 36 | Zinc | 0.02 | | | | | | | |
| 37 | Zirconium | 0.008 | ND | 2 | . 2 | | | | |
| | | | · • | _ | _ | | | | |

⁻⁻⁻ICP-AES analysis performed for the elements listed. No results shown for concentrations below detection limit.

ND = Not determined.

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Sodium hydroxide fusion in a zirconium crucible was performed to solubilize the sample.

Potassium hydroxide fusion in a nickel crucible was performed to solubilize the sample.

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E-1.3 CLEAN CLOSURE CRITERIA

Data obtained from this investigation will be evaluated against the performance standards identified as action levels in Table E-1. The term !action-level' herein refers to concentration levels that sample analytes should not statistically exceed for clean closure of the facility. These concentration levels include baseline thresholds or other concentrations that are protective of human health and the environment (e.g., Table E-1). If the concentration level of any constituent identified in Table E-1 is significantly above the initial action level, continued efforts toward clean closure will be pursued only if further assessment of action levels is warranted. This measure is proposed because contaminant concentrations for soil and concrete which may exceed an action level, also may be significantly below any health or environmental-based risk level. Reevaluation of the action levels could, therefore, be considered in the event that one or more of the initial action levels are exceeded, and further assessment of the action level is warranted. Any additional evaluation would be based on 1) the type and extent-to-which an action level is exceeded, and 2) the further assessment of health-based risk using data from sources such as the EPA Integrated Risk Information System (IRIS) (EPA 1991), the Health Effects Assessment summary tables (EPA 1989b), and methods recommended by EPA (1989a), Ecology (1991), or other appropriate sources. The DOE-RL will request approval for the use of alternative action levels from Ecology for closure of the 300 ASE, where warranted. If dangerous constituents are determined to exist in concentrations above action levels and reevaluation of action levels is not warranted, an alternative plan of closure in conjunction with the Remedial Investigation/Feasibility Study of Operable Unit 300-FF-2 will be implemented.

E-1.4 ACTION LEVELS AND BASELINE THRESHOLD CONCENTRATIONS

Initial action levels for both the inorganic and organic constituents -listed in Fable E-1 in soil samples will be the baseline threshold values obtained from the composition of baseline samples. The initial action levels for the organic constituents in concrete will be the analytical limits of quantitation (ACS 1983). Inorganic constituents in concrete and uranium in -soil-will-be-determined for information only (Appendix E-1.2.2). Alternative action levels will be considered where warranted. Ecology will review all data in the decision process. If clean closure conditions cannot be met, closure will be performed in conjunction with Operable Unit 300-FF-2 as identified in Chapter 3.0, Section 3-4 (Figure 3-1).

Alternative action levels will be health-based protection levels or other appropriate criteria. Assessment of the concentration levels that are protective of human health will be based on hazard identification, doseresponse information, exposure models, and risk characterization (EPA 1991). The parameters used in assessing potential toxicity and increased cancer risk from the 300 ASE waste constituents are listed in Table E-3. Specific values will be calculated from these data with appropriate assumptions for exposure and acceptable risk. Calculation methods for these protection levels, as52 recommended by Ecology (1991) and EPA (1989b, 1991), will be generally similar 53 and only differ in the parameters used in the exposure models, which include

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Examples of health-based action levels for soil are listed in land use. Table E-3. In general, carcinogenicity criteria will be used to define the action levels for known and probable carcinogens (Class A and B carcinogens). Chronic toxicity no effect levels will be used as action levels for constituents that are potentially toxic. It is seen in Table E-3, however. -that these protection levels for toxicity can vary be times for exposure type and by nearly 44 times as a function of land use. For carcinogenicity, land use considerations result in action levels that differ by over 132 times. The ...basic differences in the assumptions regarding exposure for the values calculated in Table E-3 are summarized at the bottom of the table. The validity and practicality of these assessments, therefore, depend on a careful assessment of how these values will be generated, and the use of realistic assumptions regarding exposure and risk for the case considered.

_____The evaluation_of_potential_soil contamination derived from the 300 ASE 16 operations will requires a comparison between the compositions of the samples from the closure area to those of an appropriate reference or background soil Because the soil covering the 618-1 Burial Ground is also the soil material upon which 300 ASE wastes may have been spilled, and because it is - probably unique to the 300 Area (i.e., from an unknown source); this soil cover is the only appropriate material (similar strata) that can be used for comparison with soil from the closure areas. Therefore, the soil cover for the 618-1 Burial Ground has been used to establish reference soil -concentrations.--Samples of the 618-1-Burial Ground soil, apart from the 300 ASE, will, in effect, serve as the local background. In order to avoid confusion, these local (area) background samples will be referred to as baseline samples because they are not natural background in the strict sense (i.e., unaffected samples that are part of the population of soil samples in -the general area outside the 618-1 Burial Ground). Thus, this type of baseline represents a special case in the context of Ecology's definition of backgrounds (Ecology 1991).

....... Note that the term 'baseline' as used in this document refers to threshold concentrations rather than mean baseline concentrations. The technical basis for establishing baseline threshold concentrations and the new methods by which significant deviation from baseline is to be determined is addressed in Section E-10, Interpretations and Statistical Treatment of Data. The selection of the number of baseline soil samples has been based on professional judgment. Eight baseline soil samples will be collected. Written notification will be provided to Ecology in the event that Westinghouse Hanford and the DOE-RL recommend that this number be changed.

Performance Standards for Organic Constituents.

| Constituent | Constituent CASRN ID number | Chronic toxicity reference dose (RfD) (mg/kg/day)* | | Cancer potency factor (mg/kg/day)* | Carcinogen class* | Health-based action level examples (mg/kg)†† | | Selection basis | |
|---|-----------------------------------|--|--------|---|----------------------|---|-----------------|-----------------|---------------------------------------|
| | **** | | | | | 1 | 2 | 3 | , |
| Primary 300 ASE Constituents | | | I | | | | | | |
| Perchloroethytene (PCE) | 127-18-4 | | 1 | 0.051 | B2** | 20* | 14 to 1,400° | 2,574* | Carcinogenicity ⁴ |
| Perchloroethylene (PCE) | 127-18-4 | 0.01 | | | · | 800 | 7,000 | 35,000 | Toxicity |
| Trichloroethylene (TCD) | 79-01-6 | 8 E *** | I | 0.011 | B2** | 64 th | 560° | 2,800 | Toxicity |
| 1,1,1-trichlomoethane (TCA) | 71-55-6 | 0.09 | i | c,d 1 | D | 7,200 | 63,000 | 315,000 | Toxicity |
| Ethyl acetate | 141-78-6 | 0.9 | ; ; | •: | | 72,000 | 630,000 | no limit | Toxicity i |
| Methyl ethyl ketone (MEK) | 78-93-3 | 0.05 | : | c : | D | 4,000 | 35,000 | 175,000 | Toxicity |
| Dichloromethane (Methylene chloride) | 75-09-2 | 0.06 | | 0.0075 | 82 | 133 | 1,164 | 17,500 | Carcinogenicity |
| Naptha (petroleum) | 8030-30-6 | 1 | | • | | N/A | N/A | N/A | · · · · · · · · · · · · · · · · · · · |
| Secondary 300 ASE constituen | ts (i.e., daugh | ter, produ | cts) | | | | | | • ! |
| 1,1-Dichloroethylene (DCE) | 75-35-4 | 0.009 | | 0.6 | A | 2 | | 219 | Carcinogenicity |
| trans-1,2-Dichloroethylene (DCE) | 156-60-5 | 0 .02 | | ć | | 1,500 | 14,000 | 70,000 | Toxicity |
| 1,1-Dichloroethane (DCA) | 75-34-3 | • | | <u>.</u> 0 | C | N/A | N/A | N/A | · : I |
| 1,2-Dichloroethane (DCA) | 107-06-2 | · | | 0.091 | B2 | 11 | | 1,442 | Carcin ogenicity |
| Vinyl chloride | 75-01-4 | c | | 2.3' | h | 0.43 | | 57 | Carcinogenicity |

Data from IRIS online data base (EPA 1991) as of 03-27-91.

Information from the Health Effects Assessment Summary Tables (HEAST) (EPA 1989b).

^{††} Example (1): Based on Ecology's (1991) residential model for child exposure due to soil ingestion: Toxicity protection levels based on child exposure using the following parameters: 16 kg body weight, ingestion of 200 mg soil/day daily, 365 days per year for a lifetime (75 years), and 100 percent efficiency for metabolism of ingested soil. Carcinogenicity is based on the same parameters for an acceptable cancer risk factor of 1 in 1,000,000 (10⁻⁶), and a 6 year duration of exposure.

Table E-3. Performance Standards for Organic Constituents. (sheet 2 of 2)

Example (2): Based on an EPA (1989b) residential model for adult exposure due to soil ingestion. Toxicity protection levels based on adult exposure using the following parameters: 70 kg body weight, ingestion of 100 mg sail/day daily, 365 days per year for a lifetime (75 years) and 100 percent efficiency for metabolism of ingested sail. Carcinogenicity is based on the same parameters for cancer risk ranging from 10° (for suspected carcinogens) to 10° (for known carcinogens) averaged over a lifetime (75 years).

Example (3): Based on Eccology's (1991) industrial model for adult exposure due to soil ingestion: Toxicity protection levels based on adult exposure using the following parameters: 70 kg body weight, ingestion of 50 mg soil/day daily, on the average of 40 percent of each year over a lifetime (75 years), and 100 percent efficiency for metabolism of ingested soil. Carcinogenicity is based on the same parameters for an acceptable cancer risk factor of 10.5, and a 20 year duration of exposure.

Carcinogenicity data for lifetime exposures are not available at this time. This substance has been evaluated by the EPA for evidence of human carcinogenicity potential. This does not imply that this chemical is necessarily a carcinogen. The evaluation is under review by an inter-office agency work group. A risk assessment summary will be included on IRIS when the review has been completed (EPA 1991).

Reference dose for chronic oral exposure is under review by EPA (pending). Carcinogen assessment summary has been withdrawn following further review. A new carcinogen summary is in preparation by the CRAVE work group (EPA 1991).

Reported human data and animal studies for this substance have not demonstrated carcinogenicity (EPA 1991).

Class D carcinogen; not classifiable as to human carcinogenicity (EPA 1991).

This chemical has not been evaluated by EPA for evidence of human carcinogenic potential (EPA 1991).

This substance is not included in the IRIS (EPA 1991) or HEAST (EPA 1989b) references. The only hazard identified for petroleum naptha is flammability at concentrations between 1-6 percent in air (Sax and Lewis 1987).

There is presently no reference dose for chronic oral exposure (RfD). A risk assessment group for this substance/agent is under review by an EFA work group. This substance is a Class C carcinogen (i.e., possible human carcinogen). This classification is based on no human data and limited evidence of carcinogenicity in two animal species (rats and mice). No quantitative estimate of carcinogenic risk from oral exposure (EPA 1991).

There is no information on this substance in IRIS (EPA 1991). The information listed here is from the Health Effects Assessment Summary Tables (EPA 1989b).

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1 E-2 CONTAMINATION SCENARIOS AND ASSESSMENTS

The 300 ASE soil and concrete sampling and analysis strategy has been based on the operational history, known spill events, and assessments of the known spill and possible barrel leak events. Contamination assessments are especially useful as a basis for development and justification of the soil and concrete sampling and analysis strategy. The primary objective of these assessments has been the determination of how much waste material from any 300 ASE facility discharge, particularly the volatile/semi-volatile constituents, would be expected to remain in the soil and concrete. and concrete worst case spill and leak scenarios were developed and analyzed to determine the time required for complete evaporation of the volatile constituents.

E-2.1 ASSESSMENT METHODS

The contamination assessment process for the 300 ASE involved the following steps:

- Development of spill/leak scenarios
- Identification and summary of pertinent conditions and physical properties necessary as model input parameters (e.g., temperature, vapor pressures, discharge rates, etc.)
- -•- Calculation of evaporation rates as a function of temperature, relative humidity, etc.
- Determination of the time required for evaporation of the total spill from the concrete surface (concrete models only); maximum surface evaporation time set equal to residence time on the concrete
- Determination of maximum penetration depth of water/solvent or solvent using calculated residence times and physical characteristics of the medium
- Determination of maximum time required for complete evaporation of water/solvent or solvent from a maximum thickness of affected concrete (concrete models only).

All models incorporated the use of information such as weather conditions, assumptions concerning discharge volumes and rates, and the physical properties of the media as input parameters into the calculations. The pertinent data and representative ranges of temperature dependent parameter values are tabulated in Table E-4. Standard calculation methods for evaporation processes (e.g., Welty et al. 1969, p. 487) were used. The relative rates of evaporation rates for Water, PCE, and TCA at various temperatures were calculated. The values for water are consistent with annual Hanford Site evaporation rates over the past 10 years (WHC 1990). Weather conditions over the spill period were obtained from Pacific Northwest Laboratory reports for the Hanford Meteorology Station. Values for the physical_and_chemical_properties of water and the solvents were obtained from

Table E-4. Model Conditions and Assessment Results.

| Model_conditions — ———— | Reference values | Range | March 1985 average | Hanford Site average | |
|--|---------------------|---------------------------------------|--------------------------|----------------------------|--|
| Temperature (°C) | 5 | -5 to 17 | 5 | 12 | |
| Relative humidity (%) | 55 | | 55 | 53 | |
| Wind velocity (mph) | 0 | | 7 | 7.7 | |
| Evaporator spill volume (gal) | 100 | | | • | |
| Barrel leak volume (gal= 1 bbl) | 55 | | | | |
| Evaporator spill rate (1/h) | 10 | 0 to 5 | | | |
| Barrel_leak rate (1/h) | <u>1</u> 0 | | | | |
| Evaporative film thickness (mm) | - I | | | | |
| Minimum evaporative surface area for a spill (ft ²⁾ | 200 | | u | | |
| Minimum evaporative surface area for a barrel leak (ft ²⁾ | 11 | | | | |
| <pre>Hydraulic conductivity for concrete (m/sec)</pre> | 10 ⁻⁹ | 10 ⁻⁷ to 10 ⁻¹⁶ | | | |
| Porosity for concrete (%) | 5 | 3 to 30 | | | |
| Physical properties: | | Water | PCE | TCA | |
| Molecular weight (g/mole) | | 18 | 165.83 | 313.6 | |
| Density (g/cc) | | 1.0 | 1.63 | 1.3 | |
| Vapor pressure (mm) | | 6.5 | 3 | 20 | |
| Calculated results concrete assessm | ents * | | | | |
| Evaporation rate (1/m ² -hr) for references | rence | 0.26 | 0.68 | 10.7 | |
| Time required for spill/leak discha- | rges (h) | 40 | 21 | 21 | |
| Fluid penetration depth for spill/ledischarges (mm) | eak | <9 | <2 | <2 | |
| _Time for complete drying of the pen- concrete (after discharge) | etrated | <7 days | <2 hours | <10 minute: | |
| Total time required for complete every (from the beginning of the spill/le | | <12 days | <24 hours | <24 hours | |

^{*} Calculated values for <u>water are for</u> the evaporator spill model, and values for <u>PCE</u> (perchloroethylene) and <u>TCA</u> (1,1,1 trichloroethane) are for the barrel-leak models.

the Handbook of Chemistry and Physics (CRC Press 1987), and the Handbook of Environmental Data on Organic Chemicals (Verschueren 1983). Other sources of information include data from the Portland Cement Association (PCA 1968) and Eeenstra and Cherry (1988). All concrete assessments were based on porous media models, i.e., unfractured concrete. Model results for each of the assessments are tabulated in Table E-4.

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Conservative values for temperature, wind speed, humidity, etc., were also used in the concrete assessments to bias results toward minimization of 3 evaporation effects in order to obtain upper limits on the duration of solvent wastes on the pad. Fluid penetration depth and subsequent drying time calculations vary directly with the hydraulic conductivity and inversely with the porosity of the medium. Therefore, conservatively large hydraulic conductivity values and small porosity values were used in the assessments.

...... Hydraulic conductivity values for unsaturated porous media, such as concrete, are up to 10,000 times smaller than those for saturated media (10⁻⁷ to 10⁻¹⁶ meters per second for limestone/concrete). Therefore, the value of 10⁻⁹ meters per second was used as the conservatively large value for concrete models. Typical values of total porosity for concrete range to values as high -- 14 as 30 percent, however, a porosity of 5 percent was used as the conservatively small value in the calculations. The reference parameter values and normal ranges for these values are listed in Table E-4. Thus, all calculated evaporation times would be faster, and calculated fluid penetration depths shallower, for parameter values that were not as strongly biased toward minimizing the evaporation effects. Therefore, it should be recognized that these assessments represent worst-case scenarios; because of this bias in 21 fluid discharge volumes and rates, temperature, humidity, wind speed, wetted surface area, hydraulic conductivity and porosity of the media.

E-2.2 CLOSURE AREA SOIL AND CONCRETE

The operational history (Section 1.1.2) and spill information (Section 1.4) have been previously described. Because this information provides the basis for development of spill scenarios and their assessment. -30--information-of-events pertinent to the assessments are briefly summarized here.

Operation of the 300 ASE from 1975 to 1985 was confined to the portion 35 of soil adjacent to the pad on its southern edge, as shown in Figure E-3. The original pad is 4 inches thick and reinforced with number 10 wire mesh. The 38 which the 300 ASE was located for solvent treatment. The soil consists of loose fill material approximately 4 feet thick that serves as a cover for the underlying 618-1 Burial Ground. The concrete area extending up to 20 feet north of the southern edge of the pad was used for the evaporator and storage -- -- 42 of barrels containing solvent awaiting treatment in the evaporator. This 43 portion of the concrete sloped to a drain as shown in Figure E-3, and was 44 included in the closure area. These sites constitute the 300 ASE closure area shown in Figure E-3.

when actually they are overlayed or touching

Note: For drawing clarity over pours are shown separated

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Figure E-3. Closure Area for the 333 East Concrete Pad.

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A new concrete pad, the 333 East 'overlay' pad, was poured over most of the west side of the 333 East Concrete Pad in September 1984. This new pad ranges in thickness from about 2.5 inches to 8 inches, and is reinforced with number 10 wire spaced at 6-inch intervals. The original 333 East Concrete Pad drain to the 300 Area process sewer, was also plugged at this time. The eastern side and extension to this composite pad was added during the Spring of 1985. The southwestern part of the original 333 East Concrete Pad is the only-part of the concrete closure area that remains exposed (Figure E-3).

E-2.3 SPILL AND LEAK SCENARIOS

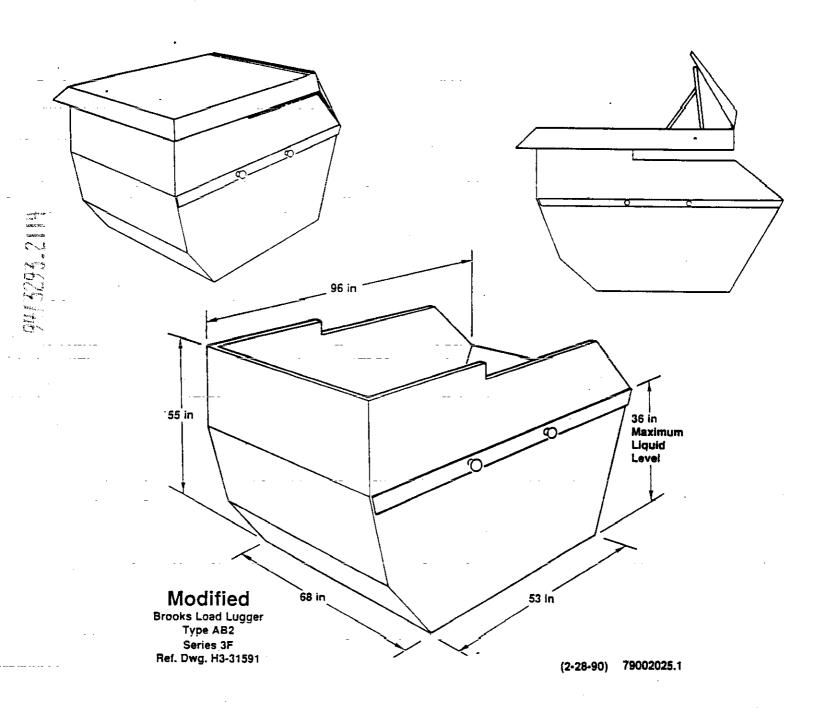
Contamination assessments have been made for the following spill and 14- leak scenarios:

- --- Water/solvent discharge (possibly including paint shop constituents) resulting from a known evaporator overflow (spill) onto the soil
 - Water/solvent discharge resulting from known evaporator overflow (spill) onto the exposed 333 East Concrete Pad adjacent to the soil at the known spill location
 - The 1,1,1-trichloroethane leakage from barrels stored on the 333 East Concrete Pad
 - The perchloroethylene leakage from barrels stored on the 333 East Concrete Pad.

E-2.4 EVAPORATOR OVERFLOW SPILL SCENARIOS

The only known spill associated with the 300 ASE operations occurred between March I and March 14, 1985. at the last location of the evaporator at the westernmost part of the soil closure area (see Figure E-2). The spill consisted primarily of water (steam condensate) based on the specific gravity and solubilities of the solvents present in the evaporator. The spill water has been estimated to have contained 0.05 percent 1,1.1-trichloroethane and 0.01 percent perchloroethylene based on solubilities. The spillage is presumed to have occurred from the north-facing cutout side of the evaporator which overhung the southern edge of the 333 East Concrete Pad (Figure E-4). It is likely that most or all of the spillage was discharged onto the soil because of the slow-leakage rate (significantly less than 5 liters per hour (i.e., about 1.3 gallons per hour), and the tendency for the water to overflow as a sheet on the outer edge of the evaporator. Because it is not certain whether any of the spillage was actually discharged onto the original 333 East concrete pad, models have been evaluated using highly liberal values for the discharge volume and rate of 400 liters and 10 liters per hour (approximately 106 gallons and 10.6 quarts per hour, respectively).

Weather conditions over this period recorded at the Hanford Meteorology Station are as follows: temperatures range 63°F to 23°F (17°C to -5°C) with an average of 41°F (5°C); average wind speed, 7 miles per hour; average



-1 -- Figure E-4. Schematic of the Evaporator.

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relative humidity, 54 percent; 0.1 inches total precipitation. The evaporation rate for water was used as a conservative reference model because the water has the slowest evaporation rate, and would persist the longest in either the soil or the concrete.

E-2.4.1 Assessment of Discharges to Soil

9.... It is indicated from an assessment of the spill onto the soil that due to the loose permeable nature of the 4-foot soil layer overlying the 618-1 Burial Ground, that most of the water/solvent would have passed through the soil and into the underlying burial ground. The upper 3 to 6 feet of soil (throughout the Hanford Site) is devoid of any water and volatile constituents -during-mid-summer months due to the complete drying of the soil percolation zone. It is indicated from soil moisture profiles (Last et al. 1976; Jones 1978) that soil moisture less than 12 to 20 feet deep normally evaporates, and that this zone becomes devoid of moisture (and any other liquids with vapor pressures similar to or greater than water) during the summer months. Any periodic spillage of water/solvent onto the soil would, therefore, be expected to completely evaporate and no longer be present if permitted to dry over a period including the summer months.

Inorganic metals dissolved in the spillage would tend to remain in the upper soil column due to the ability of the soil to absorb these constituents. Because the concentrations of dissolved inorganic constituents of interest in the raw solvent (Table E-2) were at or near detection limits, the amount of dissolved inorganic material present in the spill water would have been 2,000 to 10,000 times smaller than that in the raw solvent and, therefore, negligible. Any contribution of these inorganic constituents to the soil due to sorption or other concentration processes should have also been negligible due to the large spill volume required to sufficiently concentrate inorganic constituent to levels above detection and/or the soil baseline.

The only inorganic materials that could have been added to the soil in larger quantities were those associated with the low density and/or dissolved paint shop solvents. However, it is not known whether the paint shop solvents contained inorganic materials, or whether any paint shop solvents were present in the evaporator at the time of the spill. Because of this uncertainty. there is a possibility of some inorganic soil contamination from this source.

E-2.4.2 Assessment of Discharge to Concrete

Although it is likely that little, if any, water/solvent from the evaporator was spilled onto the 333 East Concrete Pad, worst-case models were evaluated for the discharge of a 400 liter reference volume onto the pad at a rate of 10 liters per hour. Any spillage onto concrete would have been confined to the portion of the original concrete pad, i.e, the exposed 40 foot by 10 foot southwest corner of the pad, due to the effect of the overlay pad to prevent drainage toward the plugged 300 Area Process Sewer. Due to the presence of the overlay pad, any significant spill onto this portion of the pad would have resulted in ponding of the spill. A conservative estimate of the time required for evaporation of the water/solvent from the pad surface

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-1 was based on evaporation of the entire 400 liter volume spread over an area of approximately one half of the 400 square foot exposed concrete area (i.e., 200 square feet). The minimum residence time of water/solvent on the concrete was taken to be the time required for the spill to occur (i.e., 40 hours) plus the calculated time required for evaporation of the 400 liters from the concrete surface (assuming no evaporation during the 40 hour spill time).

The assessment of the water/solvent overflow from the evaporator onto the 333 East Concrete Pad yielded the following result for the conditions described above and the reference values listed in Table E-4.

- The total spill volume of 400 liters of water/solvent would have completely evaporated from the surface of the concrete in less than 5 days. Complete drying of the concrete would have required less than 7 days for a fluid penetration depth of 3/8 inches (at 5°C). The concrete would have been devoid of spill constituents in less than 12 days after initiation of the spill.
- Water/solvent from the spill would have penetrated the concrete to maximum depth of less than 9 millimeters (3/8 inch).
- The choice of different (i.e., larger) spill volumes, discharge rates, or other parameters, would not alter the conclusion that the ___water/solvent would have evaporated from the exposed 333 East Concrete Pad in less than 2 weeks after discharge.

E-2.5 ASSESSMENTS OF BARREL LEAKS TO CONCRETE

30 Assessments_of_the_discharge of solvent-only barrel leakage onto the 333 East Concrete Pad involved the determination of the maximum duration of -32 solvent wastes on the pad and their removal due to evaporation. Evaporation models for perchloroethylene and 1,1,1-trichloroethane discharges were used to assess possible leakages from the barrels of spent solvent stored within 20 feet of the southern edge of the pad (i.e., a minimum of 55 feet from the 300 Area Process Sewer drain).

The barrel leak scenarios differ from the overflow spill scenario in that any leakage would have occurred prior to construction of the overlay pad and plugging of the 300 Area process sewer drain. Although barrel leakage rates would be expected to be smaller than the evaporator spill rate, the same discharge rate (10 liters per hour) were used as a worst-case condition. Residence time was assumed to be the time required for discharge of a 55-gallon drum (approximately 21 hours) plus the calculated time required for evaporation of solvent remaining on the pad at the end of this time. All 45 assessments are calculated on a per barrel basis and assume porous media behavior of the concrete. It was also assumed in this model that any solvent not evaporated from the pad surface or penetrating the pad would have drained into the 300 Area process sewer system.

Average annual weather conditions at the Hanford Site pertinent to these assessments are as follows: temperature, 53°F, 54 percent humidity, and a 7.7 miles per hour wind speed (PNL 1983). However, it is not known whether

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1...leakage_from the storage_barrels_ever_occurred, or when a leak may have occurred. Therefore, the weather conditions used for calculation of evaporation rates in the evaporator spill assessments are considered to be conservative, and were also used for the leak assessments (Table E-3). Leak models were also based on 1 meter (3 foot) wide wetted areas extending toward <u>6 the drain. Assessments of perchloroethylene and 1,1,1-trichloroethane leaks</u> from solvent storage barrels yield the following results for the conditions described in Table E-4:

- The leak rate dominates the residence time of solvent on the concrete surface for both perchloroethylene and 1,1,1-trichloroethane; i.e., 21 hours for a leak from a 55-gallon barrel at 10 liters per hour, plus less than I hour for evaporation of residual perchloroethylene or1.1.1-trichloroethame: maximum residence time of less than 24 hours.
 - Both perchloroethylene and 1,1,1-trichloroethane would have penetrated to a maximum depth of less than 2 millimeters.
 - The PCE would have evaporated from a wetted thickness of 2 millimeters in less than 2 hours after the discharged ceased; 1,1,1-trichloroethane would have evaporated about ten times faster.
- Only the concrete in the immediate vicinity (1 to 2 meters downslope) of a leaky barrel is likely to have been impacted by solvent wetting and evaporation.
- It is likely that leaks of perchloroethylene and/or 1,1,1-trichloroethane would not have reached the 300 Area Process Sewer drain prior to complete evaporation.

E-2.6 ASSESSMENT SUMMARY

It is concluded from the results of these assessments that any spillage of water/solvent onto the soil or 333 East Concrete Pad, or leakage of perchloroethylene or 1,1,1-trichloroethane onto the pad would have completely evaporated and no longer be present.

Therefore, it is expected that after a period of several weeks following discharge, the solvent from the 300 ASE overflow spill should not have been detected in either the soil or the exposed or covered part of the original 333 East Concrete Pad. Inorganic constituents associated with the primary 43 solvents should not have been detected in the soil. However, inorganic -44'--constituents from paint shop solvents that may have been in the evaporator at 45 the time of the spill, could have been discharged to the soil and could be present in the upper levels of the soil.

Any perchloroethylene and/or 1,1,1-trichloroethane leakage from barrels stored on the original 333 East Concrete Pad would have completely evaporated from the concrete within a few hours to days of discharge. Therefore, it is concluded that any leakage onto the concrete pad from barrels associated with the 300 ASE would have evaporated long before the overlay pad was constructed

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46 47 and would no longer be present in the exposed or covered part of the original 333 East Concrete Pad.

E-3 SOIL SAMPLING -

----A-total of 15 soil samples will be collected for the 300 ASE and submitted for analysis. Figure E-5 shows the soil closure area sampling sites. Following is a summary of the soil sampling effort.

- Six soil samples from the soil closure area.
- One duplicate soil sample.
- Eight baseline soil samples.

All of the soil samples will be taken from the material that was used to construct the 618-1 Burial Ground cover. The physical appearance of the 618-1 Burial Ground surface soil indicates that the surface has been subjected to many uses. Color differences and undulations within the soil's surface are examples of prior utilization that has rendered parts of the 618-1 Burial Ground cover unsuitable for baseline sampling. These locations are identified as disturbed surface areas in Figure E-6. The soil sampling depth, sample locations, and discretion for field changes should minimize these factors. Sample locations and depths are described in the following sections. All soil samples will be collected in accordance with EII 5.2 and analyzed in accordance with standard SW-846 procedures (EPA 1986). Field and laboratory QA/QC requirements, specific methods and protocols are identified in the 300 ASE quality assurance project plan.

E-3.1 SOIL SAMPLING LOCATIONS

- Six-verification-soil-samples-will-be-taken-in-the-300 ASE closure area. 33 - The-soil-closure area has been delineated by the locations of the evaporator during its operation. Throughout its use, the evaporator was confined to the southern edge of the 333 East Concrete Pad and the immediately adjacent 50 feet by 10 feet strip of soil (see Figure E-3). The strategy of soil sampling within this 50 feet by 10 feet area is based on the following.

- The evaporator was located on the 10 by 10 feet block of soil designated as Block A in Figure E-5 at the time of the known spill (March 1985).
- The possibility exists for other unknown leaks or spills to have occurred on the soil closure area.
- · The overflow from the evaporator would likely have spilled from the north-facing (cut-out) side as shown in Figure E-4.

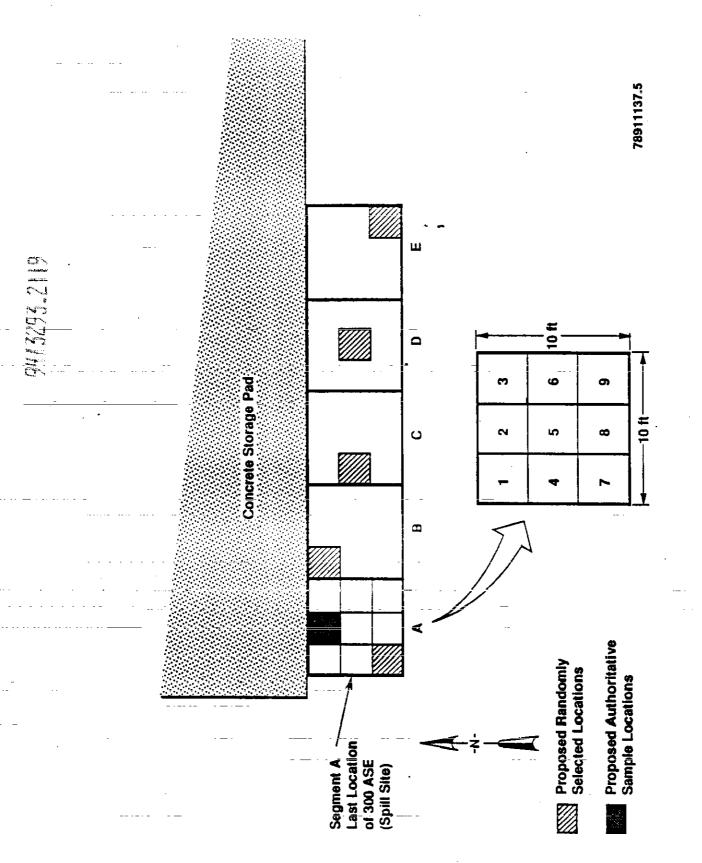


Figure E-5. Soil Closure Area and Sampling Sites.

APP E-22

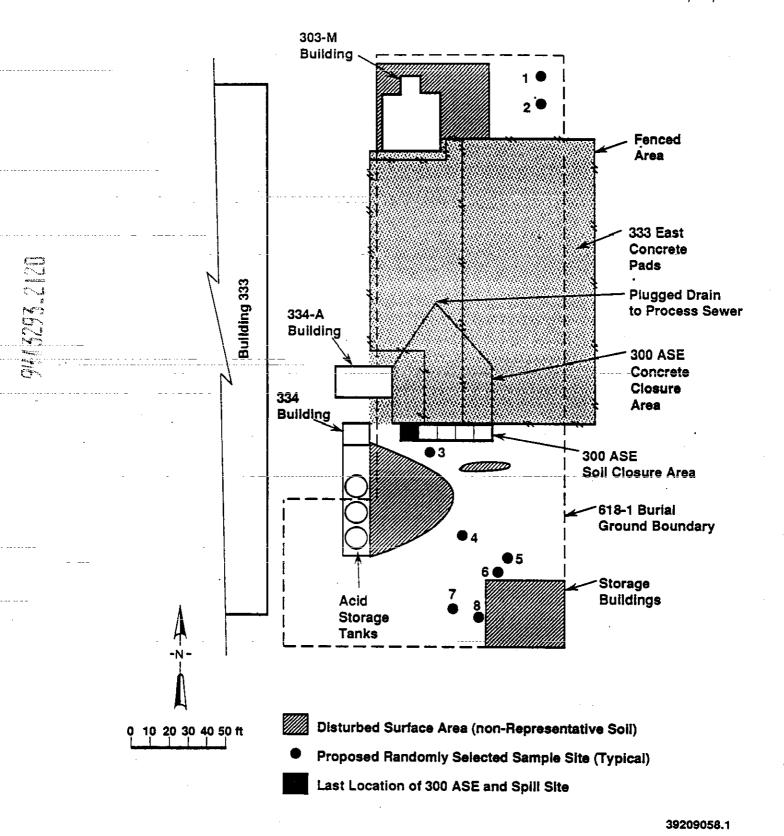


Figure E-6. Baseline Soil Sampling Sites. (78911137.3)

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The 10 by 50 feet soil closure area (Figure E-5) was divided into five blocks: Block A, B, C, D, and E. Each block was subdivided into nine equal parts (3.33 feet on a side). A sample location (grid block) was randomly chosen using a random number table (Cochran and Cox 1957) for each of the five blocks; i.e., five representative samples from the 45 possible locations. Additionally, an authoritative sample from Block A was also selected from the site of the steam condensate overflow. One of the samples will be field split to make a duplicate sample.

Utilization of a simple random sampling scheme for these samples ensures that the data obtained will be representative of the population from which the samples were taken and will meet or exceed the minimum requirements of EPA SW-846 guidelines. Following soil sampling, the sampling locations will be hand graded to blend with the surrounding topography and will not become preferential pathways for precipitation infiltration.

E-3.2 SOIL SAMPLING DEPTH

The baseline and closure area soil samples will be restricted to the upper 12 inches of the 618-1 Burial Ground soil cover. This soil cover is nominally 4 feet thick. Based on factors such as compaction over time and the potentially undulating upper surface of the 618-1 Burial Ground, it must be assumed that the actual thickness of the soil cover could vary from 4 feet to less than 2 feet in any given location. The sampling strategy is to collect shallow soil samples to avoid penetration of the 618-1 Burial Ground for health and safety reasons, but deep enough to preclude surface contaminations. Given these conditions, only the upper 6- to 12-inch zone of the soil can be safely sampled. The entire sample from each sample location will be submitted to the laboratory for analysis.

Soil samples from the sampling zone of the closure area are expected to be suitable for evaluating contamination of the soil resulting from the 300 ASE operation for the following reasons:

- Inorganic metals and radionuclides would remain in the upper 12 inches of the soil based on the demonstrated ability of the soil to absorb these constituents (e.g., Routson et al. 1979)
- Soil moisture profiles (Last et al. 1976; Jones 1978) indicate that soil moisture less than 12 to 20 feet deep normally evaporates and the zone becomes devoid of moisture (and any other liquids with vapor pressures greater than water) during the summer months. Thus, the upper 12-inches of soil would be appropriate to verify the absence of volatile organic solvents from the upper 4 feet of the soil above the 618-1 Burial Ground.

E-3.3 SOIL BASELINE SAMPLING LOCATIONS

Eight randomly selected locations within the 618-1 Burial Ground boundary have been selected for baseline sampling (Figure E-6). The selection of the number of baseline samples was based on professional judgment

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(Section E-10). The eight sampling sites were chosen from a total of 45 randomly selected grid intersections from a 10-feet grid matrix within the 618-1 Burial Ground area (exclusive of the datum reference point). The eight locations shown in Figure E-6, were screened from among the 45 possible locations based on the following parameters:

- Sample locations will be at least 10 feet away from the 334 Building (acid storage tanks), other buildings, or known surface disturbance areas
- No samples will be taken closer than 10 feet to the edge of the 618-1 Burial Ground boundary or closure area
- Sample locations will be at least 10 feet apart.

Soil at the sampling sites will be hand graded to surrounding levels—17—following sampling to minimize the generation of artificially induced fluid—18—pathways_resulting from sampling activities.

E-3.4 SOIL BLANKS AND SUMMARY TABLE

Note: This table reflects the minimum number of samples and blanks consistent with the quality assurance requirements. Additional duplicates and blanks may be taken at the discretion of the team leader to respond to field conditions. Section E-8 discusses duplicates and blanks.

· Summary Table - Number of Soil Samples and Blanks.

| | <u>Soil</u> | Duplicate | <u>Trip</u> | Field | Blanks Equipment | <u>Total</u> |
|-----------------|-------------|-----------|-------------|-------|---------------------|--------------|
| Soil Baseline | 8 | 0 | 0 | 0 | 0 | 8 |
| Soil Closure Ar | ea 6 | 1 | 1 | 1 | 1 | 10 |
| Total | 14 | 1 | 1 | 1 | 1 | 18 |

E-4 CONCRETE CORE SAMPLES AND LOCATIONS

The concrete core sampling locations and sampling locations within each core are illustrated in Figure E-7. The following is a summary of the concrete sampling effort:

- Five concrete core sites
- A total of 14 concrete samples will be submitted for analysis;
 13 samples from five cores and one duplicate

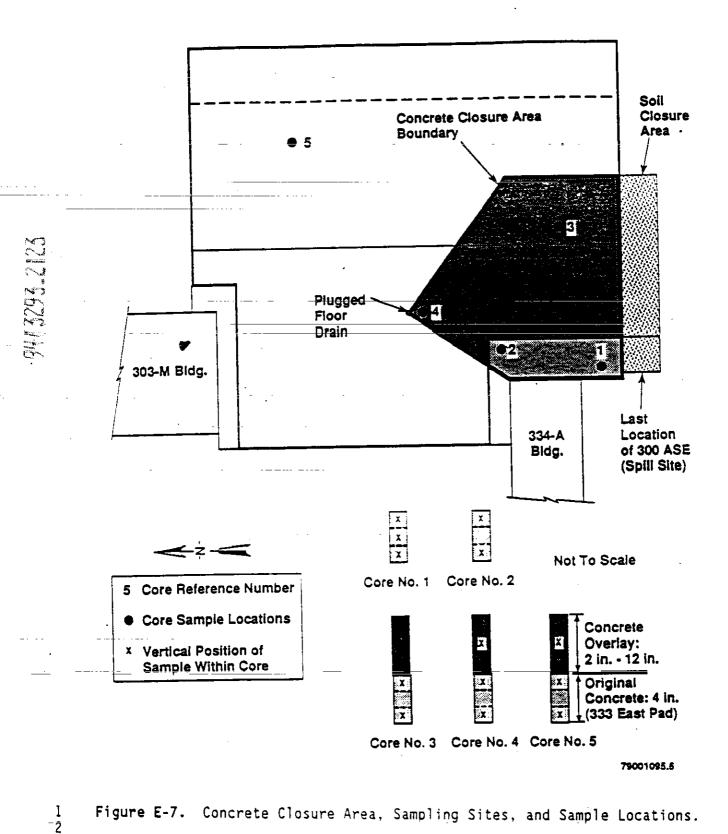


Figure E-7. Concrete Closure Area, Sampling Sites, and Sample Locations.

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- Five samples from core sites 1 and 2 on the exposed 333 East Concrete Pad
 - three samples from core 1, which will be located on a fracture and penetrates the entire thickness of the pad
 - two samples from core 2, from the top half and the bottom half
- Six samples (two each from core sites 3, 4, and 5) that penetrate to the underlying (original) 333 East Concrete Pad.
- Two samples from the middle of the 333 East overlay pad from cores 4 and 5
- One sample from core 1 or 2 samples will be field split to make a duplicate sample.

Summary Table - Number of Concrete Samples and Blanks for the 300 Area Solvent Evaporator.

| | Compute Dunling T | | | Blanks | | |
|---|-------------------|------------------|-------------|--------------|------------------|--------------|
| | <u>Concrete</u> | <u>Duplicate</u> | <u>Trip</u> | <u>Field</u> | <u>Equipment</u> | <u>Total</u> |
| 333 Concrete Pad Original pad Overlay pad | s 11 - 2 | 1 0 | 1 | 1 | 1 | |
| Total | 13 | 1 | 1 | 1 | 1 | 17 |

Note: This table reflects the minimum number of samples and blanks consistent with the quality assurance requirements. Additional samples and blanks may be taken at the discretion of the team leader to respond -- 33 ----- -to field conditions. Section E-8 discusses duplicates and blanks.

E-4.1 CONCRETE CORE SAMPLES

At least 2 inches of concrete core from the 333 East Concrete Pad will be taken at each of the five sites shown in Figure E-7. The cores will be approximately 1.3 inches in diameter. Cores from the 333 East overlay pad will require penetration of up to 8 inches to reach the underlying 333 East Concrete Pad. Air-misting drilling methods can be used to minimize heating of the core and also prevent excessive flushing of the cores with cooling water. The drilling method used to penetrate the boundary between the 300 East overlay pad and the original pad must not compromise future pad use and must also not produce airborne radioactive material (i.e., uranium dust). - Concrete cores 4 and 5 from the 333 East overlay pad, unaffected by 300 ASE activities, will be analyzed for information only as requested by Ecology (two samples).

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E-4.2 CONCRETE CORE SITES

A total of five cores will be collected at the sites as shown in Figure E-7. The five cores will yield 14 samples (including the duplicate) for analyses. Following collection of the concrete cores, the holes will be immediately backfilled and sealed with field-mixed concrete to restore the pads for other usages and to preclude precipitation infiltration and/or contaminant migration.

E-4.2.1 Exposed 333 East Concrete Pad Locations

Two cores (cores 1 and 2) will be collected from the southwest part of the exposed 333 East Concrete Pad for verifying the absence of volatile constituents in the concrete arising from the overflow from the 300 ASE, or a leak from the evaporator or solvent barrels. Core 1 will be collected from the exposed 333 East Concrete Pad and will be located on a fracture about 8 to 10 feet from the south edge of the pad. This location was selected because the fracture would have provided a pathway through the concrete, if it existed at the time of the spill; and also because of its proximity to the spill site. This core will penetrate the entire 4 inch thickness of the pad and will yield three samples for analysis. Core 2 will be collected from the northeast -corner of the exposed pad where it adjoins the 333 East overlay pad (core 1). --- 24 This location was selected because it is in line with the preexisting drain and is, therefore, the lowest point on the down gradient part of the exposed pad. Any ponding of fluid would be expected to occur at this location. This core will be approximately 4 inches long and should yield two 1-inch long samples for analysis (one from the top half and one from the bottom half).

E-4.2.2 The 333 East Overlay Pad Locations

Three cores (cores 3, 4, and 5) will be collected through the 333 East overlay pad overlying the 333 East Concrete Pad for the purpose of verifying the absence of 300 ASE solvents that may have leaked from barrels onto the original 333 East Concrete Pad. Each of the cores will penetrate --- 37 --- approximately 6-to-8-inches of concrete and must penetrate at least 2 inches into the underlying 333 East Concrete Pad. Core site 3 (two samples) has been39 selected because it is at a position in the southeastern portion of the pad approximately at a known temporary storage site of solvent barrels (see Figure 1-7 of the 300 Area Solvent Evaporator Closure Plan, Revision 3.)

the state of the remaining two core sites (cores 4 and 5) have been selected by 44 Ecology. Core site 4 (three samples) has been located about 1 foot south of the plugged drain (Figure E-7) to verify that any solvents originating from solvent barrel leaks on the original 333 East Concrete Pad have not reached 47. the drain. Core site 5 has been located outside of the closure area away from 300 ASE affected activities, as indicated in Figure E-7. This site will yield three samples: one from the middle of the overlay pad and two from the original 333 East Concrete Pad. The analysis of the samples from core site 5 will be for informational purposes only, as directed by Ecology.

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E-4.3 CONCRETE ANALYSIS

There are currently no EPA protocols for the collection and processing of ----4-concrete core samples or the identification of volatile contamination of concrete. The analytical methods used for inorganic analysis of soils can be used for the analysis of inorganics in concrete samples; however, the sample preparation and analysis methods for volatile and semi-volatile waste constituents in soils cannot be applied to concrete because sample preparation involving crushing or powdering could severely compromise the integrity of concrete samples and thus render them useless for regulatory compliance purposes (Urban et al. 1989). This is a critical concern for verifying the <u>absence of volatile waste constituents for RCRA clean closure requirements.</u> The EPA (Office of Solid Waste) and authors of the EPA SW-846 protocols concur that approved methods for the analysis of solid waste and soils for volatile constituents are not suitable for concrete samples. It is indicated from a survey of laboratory techniques for the analysis of volatile constituents in concrete, that most of these techniques are not technically defensible. Existing methods are inadequate for several reasons:

- Concrete samples cannot be pulverized or finely crushed for gas chromatography analysis without extensive loss of volatile constituents from pore spaces
- Headspace and purge and trap techniques utilized for soils are inadequate for solid concrete owing to significant differences in the nature of the media, i.e., the pore spaces from solid concrete are not effectively purged as they are for soil
- Most fluid extraction (methanol or water) techniques are inadequate because constituents in the pore volume of the concrete cannot efficiently exchange with the extraction fluid, or because the efficiency of the extraction method is unknown.

The concern of volatile loss is also paramount in the sampling of 35 concrete which potentially contains volatile waste constituents. Sampling of concrete is typically performed by coring. There are no specific guidelines regarding the coring techniques and coolant requirements, other than those concerning airborne radioactive materials. Concrete potentially contaminated with volatile waste constituents, however, requires special sampling considerations that preserve the integrity of the sample. Thus, practical and technically sound sampling and analysis methods for concrete must be calibrated or developed for RCRA activities involving concrete potentially contaminated by volatile constituents.

E-4.4 INTERIM MEASURES

Methods for practical and technically sound sampling and analysis of 49 concrete containing volatile waste constituents are being investigated. for feasibility and calibration testing of concrete testing methods are in preparation. The use of organic coolants will be avoided in any core sampling Based on expert opinion (e.g., Portland Cement Association) and calculations on the impact of coring cooling water on concrete core, it is

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indicated that air-misting while coring may be the most practical method of core sampling. Other possible methods include vacuum and heat extraction --3 -methods for pore gases from concrete cores and modified fluid extraction techniques. Decisions regarding the practicality and feasibility of the corecooling methods will require proof-of-principal and calibration testing. These activities are planned to begin in 1991, and should be completed prior to the beginning of concrete sampling at the closure site. Preliminary -----8--findings_and_developments_regarding_this_concrete.sampling_and_analysis_issue will be reported to Ecology at Unit Managers meetings or more frequently when necessary.

-------Verification-of the absence of volatile constituents that may be near detection limit concentrations requires care in the taking and preparation of the sampling for analysis. Most sample preparation methods involving crushing of the sample for gas chromatography analysis are unacceptable because crushing the sample too finely causes the release of the volatile constituents from accessible pore spaces in the sample prior to analysis. The alternative <u>method of analysis involves laboratory crushing of the concrete to obtain a</u> size fraction about 1/8 inch in diameter that will be immediately loaded into the stainless steel sample port of a thermal desorption mass spectrometer, and analyzed for organic constituents. This method is preferred because crushing to the 1/8 inch size fraction does not severely impact volatile loss due to the relatively large amount of unaffected pore space that remains. Alternative sample handling and analysis methods are also under consideration. Analysis of concrete samples for volatile organic analyses must precede analysis for inorganic constituents. Concrete samples could then be processed (e.g., crushed) and analyzed for inorganic constituents according to EPA guidelines in the same manner as soil samples.

E-5 FIELD MODIFICATIONS TO THE SAMPLING PLAN

Under field conditions the optimal aspects of preliminary sample design are sometimes not achievable. Factors influencing the sampling efforts can be equipment malfunction or breakdown, improper equipment, physical barriers to coring equipment, weather conditions, soil conditions, and overly optimistic evaluation of capabilities at sites with no previous history of dangerous waste characterization. Because of unforeseen field conditions, decisions concerning modifications to the planned activity may be necessary. conditions are encountered that require modifications in the field, the -following-steps as documented in Environmental Investigation and Site Characterization Manual, WHC-CM-7-7, EII 1.5, "Field Logbooks", and EII 5.2, "Soil and Sediment Sampling" (WHC 1989) will be observed and require postapproval of the project technical leader and/or the cognizant environmental quality assurance and quality control authority.

The field team leader will perform the following:

- Document any modifications required
- Record this information in the field logbook, including the modifications made and a justification for the change

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Obtain the project leader's approval and field logbook signature (Section E-6.3) following completion of the day's field work for instances where major deviations from the sampling plan occur.

Adherence to the normal sampling procedures will provide an accurate record of modifications and allow sampling to proceed safely, while maintaining efficient equipment and manpower usage.

E-6 SAMPLING EQUIPMENT AND PROCEDURES

The following sections outline the field sampling equipment and procedures that will be used during the soil and concrete sampling operations.

15 --- Samples collected for organic analysis will not be crushed or stirred in 16 the field for homogenization purposes in order to avoid volatile loss and invalidation of the samples. Care will also be exercised to minimize disaggregation for the same reasons.

E-6.1 SOIL SAMPLERS

Samplers to be used will consist of appropriate tools to meet the broad spectrum of soil sampling needs that may be encountered. These samplers should generally be constructed of stainless steel or have liners constructed of inert materials. The following are examples of the types of samplers that may be used:

- Thief
- Trier
- Auger
- Split spoon
- Trowel
- Scoop
- Shovel.

The proposed method for soil sampling is to use a stainless steel 38 hand-auger for boring to a depth of 12 inches.

Any additional equipment and supplies needed to perform the necessary soil sampling will be procured in accordance with WHC-CM-7-7, EII 5.2. "Soil and Sediment Sampling".

E-6.2 CONCRETE CORING AND SUPPLEMENTAL **EQUIPMENT AND SUPPLIES**

This section lists the possible types of equipment required to core drill into or through the 300 ASE concrete pad for the purpose of obtaining samples for site characterization.

- Electric generator set
- Core drill equipment

- Vacuum base drill mount
- Vacuum pump
- Hoses

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- HILTI concrete bolting equipment
- Compressed breathing air
- Non-shrink grout material
- Steam cleaning equipment
- ASTM Type IV reagent grade water.

Additional equipment and supplies will be procured as required to perform —the—necessary concrete sampling.

Procedures for concrete sampling are being prepared for inclusion into the Environmental Investigation and Site Characterization Manual (EII).

E-6.3 FIELD LOGBOOKS

A vital part of any sampling and analysis plan requires the assurance that all the information and data associated with each sample are accurate and verifiable.

The personnel conducting sampling will maintain an official log book during the effort. The logbook will be bound and have consecutively numbered pages. All information pertinent to the sampling must be recorded in the logbook in a legible fashion. Changes shall be avoided but, when necessary, will be indicated by a single line drawn through the affected text. The individual responsible for the change will initial and date the entry. Daily activities or separate sampling episodes must be dated and signed. The logbook should be protected, stored in a safe file or other repository, and maintained as a permanent record.

The following information is documented in WHC-CM-7-7, EII 1.5, "Field Logbooks":

- Project/task name
- - Locations of all sampling points, including reference permits and scale
 - Sample method
 - Date and time of collection
 - Daily identification of participants and their responsibilities
 - Number, type, volume of samples taken

⁵¹ HILTI is a trademark of HILTI Fastening Systems.

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Identification number for each sample

- Field observations (weather conditions, temperature, wind, wetness and appearance of sample, etc.)
- Laboratory of destination
- Field measurements, if any
- Signature of recording personnel.

As warranted, additional items that may be included are:

- Name and address of field contact
- Producer of waste
- Type of process
- Type of waste
- Type/purpose of sampling
- Suspected waste concentrations
- Sample distribution and transportation method
- Photographs of site for field conditions and site location verification
- Other information deemed pertinent.

E-6.4 GENERAL SAMPLE COLLECTION

This section chronologically lists the steps for collecting samples.

E-6.4.1 Sample Containers and Preservation

41--- Containers for potentially dangerous waste samples will be chosen based on their compatibility with the waste, resistance to leakage or breakage, ability to seal tightly, and required volume for an optimum sample. Containers for collecting and sorting dangerous waste samples will be made of high-density plastic or glass appropriate for the constituents to be analyzed. The containers will have tight, screw-type lids with Teflon cap liners for glass bottles.

Containers are purchased, precleaned according to EPA protocols from the supplier, and kept under strict chain of custody to preserve the integrity of

^{*}Teflon is a registered Trademark of E.I. duPont de Nemours and Company. 51

the containers and samples from collection through disposal in accordance with WHC-CM-7-7, EII 5.2, "Soil and Sediment Sampling".

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E-6.4.2 Sample Labels

Labels will be attached to each sample to prevent misidentification. They may be stick-on paper labels or tags and will be affixed to the proper sample containers prior to, or at the time of collection. All information will be filled out at the time of collection.

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Nonsmearable pencil or ink will be used, but samples may be double bagged with the label in the outer bag. Each label will contain at least the following information:

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- Site contractor
- Project/task name
- Collector's name
- Date and time collected
- Sample number.

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E-6.4.3 Sample Container Seals

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Sample container seals will be used to prevent and/or detect tampering: i.e., following collection until laboratory analyses. Seals will be applied ...27... to the cample containers before leaving the sample location. The seals will be attached so that the seal will be broken by opening the container.

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31 E-6.4.4 Sample Analysis Request Form

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The sample analysis request form as documented in WHC-CM-7-7, EII 5.2, "Soil and Sediment Sampling" has been designed to accompany the samples to the flaboratory and designate the analyses to be performed on each sample. The form also provides the sampling supervisor's with documentation to ensure that all samples have been received and that correlation between sample analysis and sample numbers is finalized and completed. The minimal information on this form includes the following:

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- Contractor
- Company contact
- Project/task name
- Sample number
- Sample type

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Analysis requested

Data and time collected

----- •-- Laboratory sample custodian.

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E-6.4.5 Storage of Samples

3 Once the samples have been collected, various steps may be required to preserve the chemical and physical integrity of the samples as documented in WHC-CM-7-7, EII 5.2, "Soil and Sediment Sampling". The method of sample __preservation_may_vary_according_to_sample_type and_parameter_to be analyzed. Preservation and storage requirements will be followed based on the specific analytical methods to be used.

-10 Regardless of the type of sample, all samples will be placed in an ice chest and cooled to 4°C (40°F) as soon as possible after collection.

------Samples collected from radiation zones (i.e., the 618-1 Burjal Ground) will be checked by a health physics technician prior to transportation from the site.

E-6.4.6 Chain of Custody Record

To ensure the integrity of the samples from collection, through analyses, to final disposition; documentation in accordance with WHC-CM-7-7, EII 5.1. "Chain of Custody", is necessary to trace possession and routing. This documentation generally takes the form of a record providing a history of 24 persons having custody of the sample to include situations where the sample is subject to the following:

- In a person's physical possession
- In view of a person
- Secured by individual so tampering is impossible.

A chain of custody record will be filled out and accompany all samples from collection to analysis. Multiple copies will be required and at least one copy must be maintained by the sampling supervisor. The following information should be included:

- Contractor
- Project/task name
- Sample numbers
- Date and time collected
- Sample type
- Number of containers
- Collector's signature
- Signature of person receiving possession
- Inclusive dates of possession
- Condition of samples upon receipt.

E-6.4.7 Disposal Procedures

Excess sample material left over from filling of sample containers will be returned to the approximate site of origin. The sampling location will be hand graded to minimize potential precipitation infiltration and/or contaminant migration.

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Nothing transported to the site will be disposed of onsite. Articles 200 such as protective clothing that have been soiled with potentially 3 contaminated materials will be temporarily placed in plastic-lined containers __4 and managed by the sampling personnel. These containers will be stored in a 5 designated area at the direction of the sampling personnel until the contents 6 have been tested for dangerous wastes. If the contaminants are found to be dangerous, arrangements will be made for proper disposal. If they are discovered to be nondangerous, materials will be laundered or disposed of 9 according to onsite procedures. Containers for temporary storage will be properly marked as potentially dangerous waste until the analyses are known.

E-7 RADIOLOGICAL CONTAMINATION CONTROL

-Because sampling is to be undertaken within a radiological controlled area, appropriate radiation procedures (radiation work procedures) will be followed. If radioactive/dangerous waste is detected during physical sampling, the following activities in accordance with WHC-CM-7-7, EII 5.5. "Decontamination of Equipment for RCRA/CERCLA Sampling" will occur.

E-7.1 PERSONNEL DECONTAMINATION PROCEDURES

A decontamination area will be established near the control station and upwind of sampling activity whenever possible. In accordance with the Health and Safety Plan (WHC-CM-7-7, EII 2.1), Westinghouse Hanford Company's (internal use only) Radiation Work Permit, and WHC-CM-7-7, EII 5.4, "Decontamination of Drilling Equipment", personnel will be radiation surveyed before being allowed to leave the controlled work area.

E-7.2 MODIFICATION TO PERSONNEL DECONTAMINATION PROCEDURES

...All modifications to decontamination procedures will be approved by the --35 - field team leader and the site safety officer. Modifications will be recorded in the appropriate logbooks.

E-7.3 EQUIPMENT DECONTAMINATION

Care will be taken in field sampling to ensure that there is no cross contamination of samples by sampling equipment. To prevent this source of _43 __contamination, _freshly cleaned and decontaminated sampling tools will be used. When equipment must be reused in the field, it will be cleaned as thoroughly as practical. For this purpose, stringent laboratory cleaning procedures have been modified for field conditions as documented in WHC-CM-7-7, EII 5.5, "Decontamination of Equipment for RCRA/CERCLA Sampling".

E-8 FIELD QUALITY ASSURANCE/QUALITY CONTROL

When finalized, sampling procedures will be consistent with EPA (SW-846) protocols. Quality control samples for the soil and concrete will be

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1 collected in accordance with SW-846 guidelines, where applicable. Nomenclature and definition of terms will be consistent with those identified in SW-846. Field quality control samples will include duplicates, field 4 blanks, equipment blanks, and trip blanks. At a minimum, 1 sample in 20 (5 percent) will be divided in the field, appropriately labeled, and treated as a duplicate. In the event that the sampling rate is less than 20 samples 7 per week, or 20 per sampling effort, at least one duplicate sample will be collected per week, or per sampling effort, whichever is greater. All samples will be submitted to the same analytical laboratory. The quality - 10 assurance/quality control samples for both soil and concrete will be handled similarly. 11

13 At least one field blank will be collected for each sampling medium 14 (e.g., soil and concrete). Field blanks will consist of aliquots of analyte-free water or solvents brought to the field in sealed containers, opened for typical sampling time, closed, properly labeled, resealed, and transported to the analytical laboratory with the other field samples. Trip -18 blanks will be identical to field blanks, but are not opened in the field. At 19 least one trip blank will accompany samples transported from the field to the analytical laboratory.

Equipment blanks (post-decontamination rinsate samples) will consist of field blank samples (i.e., analyte-free deionized water) opened in the field and the contents poured appropriately over or through the sample collection equipment after decontamination. At least one representative equipment blank will be collected for each sampling medium.

E-8.1 PERSONNEL TRAINING

Several training courses has been specified for soil sampling personnel. The required courses and activities are documented in WHC-CM-7-7, EII 1.7. "Indoctrination, Training, and Qualification" as follows:

- Occupational Safety and Health Administration (OSHA 1989) approved. 40-hour, Dangerous Waste Worker Training or Hanford-approved. 24-hour, basic waste site health and safety training
- Cascade and escape pack training (Hanford)
- Self-contained breathing apparatus training (Hanford)
- Radiation worker training (Hanford)
- A 3 day on-the-job training session under the supervision of an experienced person before full responsibility of the particular job may be assumed
- First aid training is desirable, but not mandatory, for work on the Hanford Site
- All personnel at the dangerous waste site will be required to have 53 ---- reviewed-the sampling and analysis plan (this document).

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E-8.2 STANDARD SAFETY PROCEDURES

In addition to the soil sampling requirements of SW-846, the following procedures will apply each time personnel make a site entry for soil sampling purposes.

- No personnel will be at the site without a designated 'buddy'.
- One of the persons entering the site will be designated to be in charge by the Health and Safety Plan.
- Personal protective equipment will be worn as specified. Approved deviations will be entered in the field logbook and signed by the field team leader and the site safety officer.
- Field work will be planned prior to site entry.
- Equipment needed for work will be inventoried and inspected prior to the site visit to ensure that all equipment is present and in operable condition.

E-8.3 HEALTH AND SAFETY PLAN

A Health and Safety Plan is required for all dangerous waste sampling sites. The plan is intended to specify information pertinent to field assignments and to be a guide in times of an unusual situation or emergency. 28 The Health and Safety Plan is not intended to be an exhaustive encyclopedia covering every conceivable situation or question. The field team leader will always be present during site visits, and will be trained and experienced with the authority to make field decisions deviating from soil sampling procedures. During sampling activities, the site safety officer will be present or "immediately available and will have authority to make decisions regarding safety issues. Telephone numbers also will be provided if further assistance is required. A reviewed and approved Health and Safety Plan will be developed and completed before initiation of soil sampling in accordance with WHC-CM-7-7, EII 2.1, "Preparation of Health and Safety Plans". All deviations .38 from the approved Health and Safety Plan must be documented in the field -39- -logbook-by the field team-leader and later initialed by the site safety officer.

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LABORATORY PROCEDURES, QUALITY ASSURANCE. AND QUALITY CONTROL

The following sections provide information on laboratory procedures. -quality assurance, and quality control.

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E-9.1 LABORATORY RECEIPT AND LOGGING OF SAMPLE

A sample custodian will receive the samples in the laboratory. Upon receipt of a sample, the custodian will, as documented in WHC-CM-7-7, EII 5.1. "Chain of Custody", inspect the condition of the sample and the sample seal; verify the information on the sample label and seal against that on the chain of custody record; assign a laboratory number; log in the sample in the laboratory logbook; store the sample in a secured sample storage room or cabinet; and report missing or damaged samples.

E-9.2 ANALYTICAL PROCEDURES

Analyses will be performed by the laboratory in accordance with EPA requirements. Whenever available, SW-846 methods will be used. Where appropriate, other sample preparation and analytical methods will be employed upon approval from Ecology.

21 E-9.3 LABORATORY QUALITY ASSURANCE AND QUALITY CONTROL

The laboratory will ensure the integrity and validity of test results through implementation of an internal quality control program. The program 26 will meet the quality control criteria of EPA guidelines and, as applicable, SW-846, and The Handbook for Analytical QC in Water and Waste Water Laboratories, third edition of EPA-600/4-79-019 (EPA 1979). A system of ____29__ reviewing and analyzing the results of these samples will be maintained to ---- 30 detect problems due to contamination, inadequate calibrations, calculations. procedures, or other causes. Standard methods will be used and alternative ---- 32 methods that are developed or adapted will be tested and completely ---- 33 documented. All-methods and-method changes will be approved by the Westinghouse Hanford Company contracts representative.

.36.... The quality control procedures for laboratory analyses will include 37 evaluation of blanks, matrix spikes, surrogates, and other quality control samples as appropriate for determination of the quality assurance/quality control (QA/QC) for each matrix and analytical method. Quality control procedures for individual methods will be documented in the laboratory's analytical procedures.

All analytical methods will be in compliance with minimum quality control 44 criteria of standard EPA methods, where such criteria exist (EPA 1986). The analytical laboratory will have obtained the Westinghouse Hanford Company approval on all methods prior to the analysis of samples.

The EPA guidelines for the determination and reporting of accuracy, precision, and detection limits of the analytical methods will be met. analytical laboratory will provide tabulated information representative of 51---accuracy, precision, and detection limits for at least the three month period 52 over which the analyses were performed. Laboratory quality assurance/quality. control information will be required on representative constituents for each

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of the analytical methods used, e.g., those evaluated for the EPA contract laboratory program (CLP), for a soil matrix. Accuracy and precision will be determined for, and representative of, the mid-range of the standard working range used for the analysis. Information on accuracy and precision can be determined from the matrix spike and/or surrogate spike recoveries of standard reference samples or EPA control samples, if appropriate. Accuracy and precision will be reported in a manner similar to that indicated in SW-846 (6010-16). The upper and lower limits of the standard working range used for the analysis will be reported in a form comparable to Form XIII (SW-846; ONE-32).

Representative lower limits of detection will not exceed the EPA requirements for detection limits. Detection limits will be reported as one of the following: (1) the lower limit of the standard (linear) working range used for the analysis, (2) the low concentration standard used in the calibration provided that this concentration does not exceed EPA requirements. or (3) the detection limits and/or quantitation limits for each analyte calculated from measured standard deviation of the average background noise level using the criteria outlined in SW-846 (ONE-15; THREE-2), for either the interpolated background beneath analyte peaks in the low-concentration calibration standards, or at the peak spectral positions in a reagent blank. The analytical laboratory will specify the definition of lower limit of detection used. Detection limits will be regarded as the lower limits of reportable concentrations of an analyte. Concentrations less than these 25 limits will be reported as less than detection limits (e.g., <1.0 mg/kg). 26 Representative precision at the detection limits also will be determined and reported in a similar manner as the precision for the mid-range. Precision at 28 the lower limit of detection, as defined above, will be determined from the replicate analyte peak measurements for the low-concentration calibration standards or for the samples used in establishing the lower limit of detection. Representative detection limits and associated precision on the _lower_limit of_detection and precision at this limit, will be reported for .33...each analyte in a form comparable to FORM VIII (SW-846; ONE-25).

35 A duplicate and a blank sample will be processed with each sample batch or after every 20 samples, whichever is more frequent. Quality control samples prepared in the same matrix and in the same manner as a mixed calibration standards, at 10 times the instrument detection limits or in the mid-range of the working standard calibration, will be analyzed after every 10-samples (e.g., SW-846, 6010-9,10; 7000-10). Spike recovery will be calculated by the method detailed in ASTM Method D 3856, Section 11.5.4, Annual Book of ASTM Standards, Volume 11.01 (1986). Analytical data on blanks, duplicates, and control samples will be reported in the same manner as samples. Care will be taken to ensure that duplicate samples are representative of the original sample.

E-9.4 DATA REPORTING

After completion of the sampling effort, verification documents will be provided for actual sample locations, numbers of samples, and specific methods used for collection as documented in WHC-CM-7-7, EII 6.1, "Activity Reports of Field Operations". Data received from the laboratory will be reviewed,

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analyzed, and summarized statistically. Reporting the results of the Soil and Concrete Sampling and Analysis Plan will be in accordance with applicable RCRA regulations.

E-9.5 SAMPLE DISPOSITION

After all analyses have been completed as specified, reports will be reviewed for anomalous data. Requests for reanalysis or data checks will be made as soon as possible. At the certified completion of all analyses, the samples will be either returned to the collector, properly disposed of, or archived by the laboratory, if requested. In no case will the samples be held longer than 3 years, unless specifically designated.

E-10 INTERPRETATIONS AND STATISTICAL TREATMENT OF DATA

All data collected will be analyzed and tabulated for evaluation using the methods described in SW-846 and other guidance documents and statistical references, where applicable (e.g., Barth and Mason 1984; EPA 1986a). Laboratory data will be provided to Ecology upon completion of sampling and analysis. Data for individual constituents will be summarized and will include the following information:

- Number of 'less than' (LT) detection limit values
- Detection limit value
- Total number of values
- Mean values
- "Standard deviation
- Coefficient of variation
- Minimum value
- Maximum value
- Representative uncertainties (precision).

The data will be interpreted by qualified scientists and statisticians. The technical basis for establishing the baseline threshold concentrations. the methods by which significant deviation from baseline will be determined are being developed by Westinghouse Hanford Company and the U.S. Department of Energy-Richland Operations Office for the Hanford Site (WHC 1989). The use of background data in evaluating closure of the 300 ASE will involve the comparison of individual sample concentrations to a background threshold using a Tolerance Interval-type approach to the analysis (e.g., EPA 1989c). This type-of-comparison-defines an upper concentration limit (i.e., threshold) beyond which a sample will be suspected to be contaminated. The baseline concentrations for each constituent of interest in the 300 ASE soil will be based on statistical methods frequency distribution methods (e.g., EPA 1989c; WHC 1989), or other appropriate techniques. Data evaluation will be based on statistical criteria and professional judgment, where appropriate. The decision tree for the evaluation of the compositions of soil and concrete verification samples is illustrated in Figure E-8.

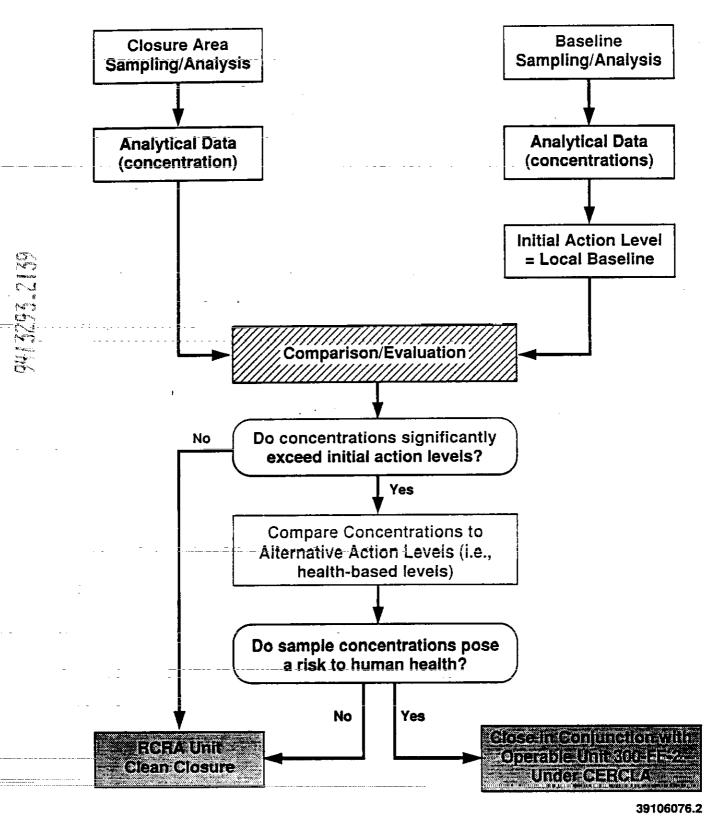


Figure E-8. Decision Tree for Soil and Concrete Verification Samples. (79001152.2)

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APPENDIX F AIR QUALITY MONITORING RECORDS AT THE 300 AREA SOLVENT EVAPORATOR

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| Letter - Ambient Solvent Concentrations Near the 333 Building Waste Solvent Evaporator Bin (Issued October 17, 1979) | l Page |
|--|--------|
| Letter - Waste Solvent Evaporator Vapors - 333 Building (Issued August 1, 1984) | l Page |



HANFORD ENVIRONMENTAL HEALTH FOUNDATION

Dist: B. D. Breitenstein, M.D.

B. D. Reinert

October 17, 1979

CO 5220 ·

UNC Nuclear Industries 1109-H Building, 100-N Area

Attn: E. M. Greager

AMBIENT SOLVENT CONCENTRATIONS NEAR THE 333 BUILDING WASTE SOLVENT EVAPORATION BIN

On September 11, 1979, ambient air sampling for organic solvent vapors was conducted at the waste solvent evaporation bin located outdoors east of the 333 Building. The bin is essentially an open metal industrial refuse bin fitted with a rain canopy that receives organic solvent wastes from the 333 Fuels Building. Purpose of the sampling was to determine what, if any, effect this evaporation facility has on surrounding ambient air quality.

Past degreasing operations in the 333 Building have utilized trichloroethylene as the degreasing solvent. Trichloroethylene has since been phased out and replaced with perchloroethylene. Sampling was performed for both solvent vapors at two locations, one approximately 4 feet above ground level and 6 feet south of the bin, the other approximately 3 ft above ground level and 45 feet south of the bin. Samples were collected over a 90-minute sampling duration (12:30 pm-2:00 pm) by drawing air through charcoal tubes using precalibrated portable sampling pumps. Weather conditions were warm and sunny, with air temperatures in the upper 70's to mid-80's and a gentle-breeze from north to south.

Samples were analyzed by gas chromatography. As expected; no trichloroethylene ' vapors were detected at either sampling location. Perchloroethylene vapors were detected only at the location nearest the bin and then at the very low concentration of 0.07 ppm. Although no ambient air standard exists for perchloroethylene vapors, the prescribed DOE occupational exposure limit* would allow an 8-hour time-weighted average exposure of 100 ppm to which it is considered nearly all workers could be exposed for a normal 8-hour workday or 40-hour workweek, day after day, withoutadverse effect.

The concentration of perchloroethylene measured is insignificant both due to its low magnitude and physical remoteness from workers. No detrimental air quality effects are indicated. If you have any further questions, please contact Environmental Health Sciences.

Environmental Health Sciences

^{1/} ACGIH Threshold Limit Values, 1979.



HANFORD ENVIRONMENTAL HEALTH FOUNDATION

August 1, 1984

CO 8734

UNC Nuclear Industries 3707-D Bldg. 300 Area:

Attn: Barry Vedder

WASTE SOLVENT EVAPORATION VAPORS - 333 BUILDING

This will document the results of two air samples collected July 18, 1984, to measure methyl chloroform (1,1,1, trichloroethane) and perchloroethylene vapor concentrations at and near the 333 Building outdoor waste solvent evaporator. Both samples were collected down wind of the evaporator, one 2.5 ft. from the evaporator opening, the other 13 ft. from the opening. The ambient air temperature at the time of sampling was approximately 90 °F.

The sample results indicate that vapor concentrations were less than I ppm for each solvent at both sample locations.

Should you have any questions regarding these results, please contact Environmental Health Sciences.

C. H. St. John

Environmental Health Sciences

hk

1By use of pre-calibrated battery operated pumps and charcoal sorption tubes.

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